SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF SANTA BARBARA
SANTA MARIA BRANCH; COOK STREET DIVISION
DEPARTMENT SM-2 HON. RODNEY S. MELVILLE, JUDGE

THE PEOPLE OF THE STATE OF)
CALIFORNIA,)
Plaintiff,)
-vs-) No. 1133603
MICHAEL JOE JACKSON,)
Defendant.)

REPORTER'S TRANSCRIPT OF PROCEEDINGS

MONDAY, MAY 9, 2005

8:30 A.M.

(PAGES 9438 THROUGH 9501)

REPORTED MICHELE MATTSON McNEIL, RPR, CRR, CSR #3304
BY: Official Court Reporter 9438

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I N D E X

Note: Mr. Sneddon is listed as “SN” on index.
Mr. Zonen is listed as “Z” on index. Mr. Auchincloss is listed as “A” on index.
Mr. Mesereau is listed as “M” on index. Ms. Yu is listed as “Y” on index.
Mr. Sanger is listed as “SA” on index.

DEFENDANT’S
WITNESSES DIRECT CROSS REDIRECT RECROSS
CONTRERAS, Francin 9441-SA 9446-Z 9450-SA
GOFORTH,
Gayle 9451-SA 9460-Z 0466-SA 9468-Z
SILVA, Violet 9469-SA

Santa Maria, California
Monday, May 9, 2005
8:30 a.m.

(The following proceedings were held in open court in the presence and hearing of the jury:)

THE COURT: Good morning.
COUNSEL AT COUNSEL TABLE: (In unison) Good morning, Your Honor.
THE COURT: Raise your right hand, face the clerk.

FRANCIN CONTRERAS
Having been sworn, testified as follows:

THE WITNESS: I do.
THE CLERK: Please be seated. State and spell your name for the record.
THE WITNESS: Francin Contreras.
F-r-a-n-c-i-n; C-o-n-t-r-e-r-a-s.
THE CLERK: Thank you.

DIRECT EXAMINATION
BY MR. SANGER:
Q. Good morning. Miss Contreras, were you known by another name at one point? 9441

A. Francin Orozco.
Q. Okay. And Contreras is --
A. My married name.
Q. Your married name. So you were married since then?
A. Yes.
Q. All right. And have you worked at Neverland Valley Ranch?
A. Yes.
Q. When did you first start working there?
A. I believe it was ‘91, ‘92. I’m not sure. ‘91.
Q. In 1991. And how long did you work there?
A. About two years.
Q. How are you presently employed?
A. I’m at Foods Co., Lompoc, California, lead cashier.
Q. All right. Now, in the time period of 1991 and ‘92, did you have occasion to work with Adrian McManus?
A. Yes.
Q. Can you describe your relationship with Ms. McManus?
A. A good friend at that time.
Q. And at that time, did you go to her house, she go to your house?
A. Yes.
Q. Did you know her husband? 9442

A. Yes.
Q. All right. Did you remain friends after you stopped working at Neverland Ranch?
A. For a bit.
Q. Okay. During the time that you knew Ms. McManus, did she ever make any statements to you whatsoever with regard to the molestation charges against or accusations against Mr. Jackson back at that time, in 1993?
A. Never.
Q. What did she tell you, if anything?
You have to sit forward, first of all, a little bit, because that microphone --
A. Oh, sorry.
Q. Everybody has that problem. You just have to talk into the microphone.
A. All right.
Q. Did she say anything one way or the other about the charges, and about Mr. Jackson?
A. Never. She always talked good about him.
Q. All right. Now, at one point, were you aware that she filed a lawsuit against Mr. Jackson?
A. That's when I didn't talk to her no more. We didn't see each other.
Q. All right. What was -- did you talk to her at some point right at the end, right when that breakup occurred? Did she tell you what she was doing with her lawsuit, if anything? 9443

A. She just -- well, meaning -- I really don't know what you mean.
Q. Okay. Did she talk to you about her lawsuit? You say you stopped seeing her at some point after she filed the lawsuit, right?
A. Right.
Q. Okay. Did she tell you why she was filing a lawsuit?
A. No.
Q. All right. Now, did you visit the house of Mr. and Mrs. McManus?
A. Yes.
Q. Where did they live?
A. In Santa Maria.
Q. And did you visit there while Ms. McManus was working for Mr. Jackson?
A. Yes.
Q. What did you observe at her house?
A. In all her rooms?
Q. Yeah. Let's talk about -- was there a room that had some --
A. Yes.
Q. -- Michael Jackson items? Can you tell us about that?
A. She had hats that belonged to Mr. Jackson. Pajamas. Watches, T-shirts. Items that belonged to the ranch.
Q. Okay. Now, did you ever see her take items 9444

from the ranch?
A. Yeah.
Q. And how did she do that?
A. In a laundry basket. She used to take home Mr. Jackson's clothes. She said she was going to iron them. But there was, like, a hat underneath there, and you can't iron a hat.
Q. Okay. Was there an occasion where you all were asked to wrap Christmas presents for needy children?
A. Yes.
Q. Sit a little closer. I'm sorry.
A. Yes.
Q. Everybody has to do it. It's not comfortable, sorry.
What can you tell us about that?
A. We were sent home -- because there was, like, lots of toys and gifts for the children. And we really couldn't do all the wrapping at the ranch, because it was quite a bit, so we were asked to take some of the toys home to wrap, and bring them back, because they didn't belong to us. And I noticed that Adrian had kept some Super Soakers and other items of toys for her son.
MR. SANGER: All right. Okay. Very well.
I have no further questions.
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// 9445

CROSS-EXAMINATION
BY MR. ZONEN:
Q. I'm sorry, is it Miss Contreras or Mrs.
Orozco?
A. Contreras.
Q. Miss Contreras, was it more than one
occasion that you saw Adrian McManus taking a
laundry basket with items home?
A. Yes.
Q. Was that a fairly regular occurrence?
A. Yes.
Q. And would she stop to show you the items
that she had in the laundry basket?
A. She didn't stop.
Q. So she wasn't showing you what she had and
what she was taking home?
A. I seen them. We were walking together out
to her car.
Q. All right. And she would have it in a
laundry basket covered with items, but you would,
nonetheless, see the items because you were looking
through them?
A. No.
Q. You understood at the time that she was
stealing at that time?
A. No. I thought she was taking them home to
iron.
Q. She was taking a hat home to iron? 9446

A. That's what I said before, how could you iron a hat?
Q. That's my question to you. Did you see on each of the occasions that she took items home to iron, she had items that you believe that she was stealing?
A. No. She was taking them home to iron.
Q. All right. On only one occasion did she take home an item that you believed she was stealing?
A. No, because we were taking toys home, all of us were, to wrap. And they were supposed to be returned.
Q. I'm asking questions specifically about the occasions when you saw her bringing items in a laundry basket covered with laundry.
A. Right.
Q. Now, she did take items home to iron that were Mr. Jackson's items and she would bring them back; is that right?
A. I don't know if she brought them back. I didn't see her bring them back.
Q. Was that part of her job as you understood it?
A. To take them home and iron, yes.
Q. It was part of her job to take items that were, in fact, Mr. Jackson's personal clothing, to iron them for Mr. Jackson, and return them ironed to 9447

Mr. Jackson; is that correct?
A. I believe so.
Q. And she did that on a fairly regular basis?
A. Yes.
Q. She would work at home doing ironing for Mr. Jackson?
A. I never seen her ironing them, so I couldn't tell you, sir.
Q. She would -- she would take it -- a laundry basket with his clothing to iron and she would tell you that that's what she was doing?
A. Yes.
Q. You have no reason to believe she wasn't bringing them back; is that right?
A. Right.
Q. On one occasion you saw a felt hat that didn't need ironing?
A. Yes. I don't know what she was doing. She could have took it home to mend. I have no idea, sir.
Q. She could have mended it and brought it back the next day?
A. I suppose so.
Q. Did you ever ask her about that?
A. Nope.
Q. Did you ever ask her about the Super Soakers that were in there?
A. No.

Q. Miss Contreras, did you go to work for Mervyn's after you left Neverland?
A. Yes, I did.
Q. Did you get fired from Mervyn's for stealing?
A. No.
Q. Were you prosecuted for stealing from Mervyn's?
A. No, it was trespassing.
Q. Well, you were prosecuted for stealing; is that right?
A. No, sir, it was trespassing.
Q. You were trespassing in the store that you were working in --
A. No, sir. No.
Q. Were you not working in there at the time?
A. Yes, I was.
Q. You were prosecuted for trespassing in a store that you were working in?
A. No, sir.
Q. Did -- were you ordered by the court to make restitution to Mervyn's?
MR. SANGER: I'm going to object, Your Honor, as to relevance.
THE COURT: Sustained.
MR. ZONEN: I have no further questions.
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REDIRECT EXAMINATION
BY MR. SANGER:
Q. At the McManus residence, was there a particular room that was dedicated to the Michael Jackson --
MR. ZONEN: Objection; exceeding the scope of the cross-examination.
THE COURT: That's true.
Did you want to reopen that?
MR. SANGER: Well, let me ask it a different way. The Court may see where I'm going.
Q. Whether or not you saw things in the laundry basket, did you see things from the ranch in Ms. McManus's house?
A. Yes, sir.
Q. And were they displayed in some fashion?
A. Yes.
MR. SANGER: All right. Okay. No further questions.
MR. ZONEN: No questions.
THE COURT: Thank you. You may step down.
MR. SANGER: Call Gayle Goforth.
THE COURT: Would counsel approach on this? While she's coming in, counsel approach. The District Attorney filed an in limine statement.
(Discussion held off the record at sidebar.)
THE COURT: Good morning. I'm going to ask you to face the clerk here, raise your right hand. 9450

Go ahead.

GAYLE GOFORTH
Having been sworn, testified as follows:

THE WITNESS: I do.
THE CLERK: Please be seated. State and spell your name for the record.
THE WITNESS: My name is Gayle Goforth. G-a-y-l-e. Last name, G-o-f-o-r-t-h.
THE CLERK: Thank you.
THE COURT: Miss Goforth, we're just going to ask you to sit there a minute. I know you don't know what to expect, but I was just talking to the attorneys here, and I'm going to talk to them for a second before we do anything.
THE WITNESS: Okay.
THE COURT: (To the attorneys) Come forward.
(Discussion held off the record at sidebar.)

DIRECT EXAMINATION
BY MR. SANGER:
Q. Okay. Good morning.
A. Good morning.
Q. Do you know the gentleman seated right here?
A. Yes, I do.
Q. Who is that?
A. Michael Jackson. 9451

Q. All right. And how long have you known Mr. Jackson?
BAILIFF CORTEZ: I need you to speak right into the microphone.
THE WITNESS: Sorry.
I became employed at Neverland Valley Ranch in 1989.
Q. BY MR. SANGER: All right. Now, every single witness, even those with louder voices than yours, has to sit right up to that microphone for some reason it's a little uncomfortable there. So just try to project. You have a soft voice to start with.
Okay. So you started working in 1989. And what was your job when you started there?
A. I was a housekeeper.
Q. And did you eventually attain a different position?
A. Yes, I did.
Q. And what was that?
A. I became supervisor of housekeeping.
Q. All right. And when did you become supervisor of housekeeping?
A. In 1990.
Q. Now, did you know Adrian McManus?
A. Yes, I did.
Q. Did you know Ralph Chacon?
A. Yes, I did. 9452

Q. Did you know Kassim Abdool?
A. Yes, I did.
Q. Were they also employees at the ranch?
A. Yes, they were.
Q. Were any of them working under you?
A. Adrian was.
Q. Ms. McManus was on the housekeeping staff;
is that correct?
A. Yes, she was.
Q. And you were at that time the head of
housekeeping?
A. Yes, I was.
Q. What was her assignment when she first
started to work for you?
A. She was a housekeeper.
Q. Did she eventually get a new designation?
A. Yes, she did.
Q. And what was that?
A. She became -- she -- a caretaker of Mr.
Jackson's room.
Q. All right. Now, when you say "Mr. Jackson's
room," what are you talking about?
A. Primarily -- pardon me, primarily cleaning
his room and taking care of his personal items.
Q. All right. Now, first of all, if you'd like
some water you can pour yourself some there.
A. Okay. Thank you.
Q. All right. When you say "his room," we're 9453

talking about the suite that we've all heard about
that has the two floors and so on?
A. Yes.
Q. And part of her responsibilities were to
make sure that the place was clean, I take it.
A. Yes.
Q. And she also was responsible for making sure
that his laundry was done; is that correct?
A. Yes.
Q. Now, did you have facilities at the ranch to
do laundry?
A. Yes, we did.
Q. And during that period of time and perhaps
today, but during that period of time, was the
laundry done at the ranch?
A. Some of it was. A lot of the things were
sent to the dry cleaners.
Q. I'm sorry, not dry cleaning, but the actual
laundry, if you were going to wash sheets or wash
clothing that did not need to be dry cleaned.
A. Yes.
Q. And could it be ironed there?
A. Yes.
Q. You had a room to do that in; is that
correct?
A. Yes, we had a laundry room.
Q. All right. Was it part of Ms. McManus's
duties to take clothing home, Mr. Jackson's clothing 9454

home, to iron it?
A. Not necessarily.
Q. Okay. And during that period of time when -- can you tell us when Ms. McManus was there, to the best of your recollection? Let me withdraw that.
Why don't you just tell us when she was taking care of Mr. Jackson's room.
A. I believe she started cleaning his room in -- around 1990, early 1991.
Q. Okay.
A. Until 1994.
Q. All right. Now, in 1994, did Ms. McManus stop showing up for work?
A. Yes, she did.
Q. Do you recall roughly when that was?
A. I don't remember exactly when.
Q. Sometime in 1994, though?
A. Yes.
Q. And the last time -- when I say "the last time," she stopped showing up for work and then she just never came back; is that correct?
A. That's correct.
Q. Before that happened, do you recall her taking any leave or being absent from work?
A. A lot, yes.
Q. And was Ms. McManus -- what was her attitude towards her position; do you recall? 9455

A. Oh, gosh. Well, she changed -- when she was a housekeeper, when she became -- to take care of Mr. Jackson's room, she changed her attitude.
Q. And what did her attitude change to?
MR. ZONEN: I'll object as speculative and irrelevant.
THE COURT: Overruled.
You may answer.
THE WITNESS: I can answer?
Q. BY MR. SANGER: Yes.
A. Like she was above everybody.
Q. Was she a hard worker?
MR. ZONEN: I'll object as irrelevant.
MR. SANGER: I'll withdraw it.
Q. All right. Now, let me move ahead. When did you stop working at the ranch?
A. In 2002.
Q. All right. Were you at the ranch at the time the Arvizo family came to visit?
A. Yes, I was.
Q. And do you remember -- what do you remember about the Arvizo family?
A. They were at the -- their first time that they came, they were very concerned about their son's health.
Q. Okay. And that was Gavin?
A. Yes.
Q. And he was not doing well at that time? 9456

A. No, he wasn't.
Q. How many times did you see the Arvizo family at the ranch before you left your employment there?
A. The first time I saw the whole family was their first arrival. Thereafter, the father and the two boys came back, I would say, maybe four or five times.
Q. Okay. So the first time the whole family was there, that means the mother was there as well, is that what you're saying?
A. Yes.
Q. Do you remember her name?
A. Janet.
Q. Did you have any interaction with Janet Arvizo?
A. Yes, I did.
Q. And what interaction did you have?
A. Shortly after their arrival, she started talking to me about being concerned about her son's health, and that they were having money problems, and that -- she asked me if I would give her a job at the ranch.
Q. And what was your response to that?
A. I told her that she needed to be more concerned about her son and that it was a long ways to --
MR. ZONEN: I'm going to object to the response as hearsay. 9457

THE COURT: Sustained.
MR. ZONEN: And irrelevant. Move to strike.
THE COURT: Stricken.
MR. SANGER: All right. Not for the truth of the matter, Your Honor, but for the purpose of the response, if I may.
THE COURT: The response that Janet makes to her statement?
MR. SANGER: Yes, that's correct.
THE COURT: All right.
Q. BY MR. SANGER: Did you say anything specifically about the distance between her home and the ranch?
A. Yes, I did.
Q. And what did -- what did Janet Arvizo say in response to that?
A. She told me she would move to the valley in order to be closer to the ranch.
Q. When you say "the valley," you mean the Santa Ynez Valley?
A. Yes, I do.
Q. Now, -- excuse me, I'm sorry. Going back to the entire time that you worked at the ranch, did you have occasion to see Mr. Jackson drink alcohol?
A. A few occasions.
Q. All right. And roughly -- let's put it this way. When did you see him drink? What occasions 9458

would you see him drink alcohol?
A. At mealtime, dinnertime.
Q. Okay. Now, when you -- at some point during this period of time, or from time to time, you actually took care of Mr. Jackson's room as well; is that correct?
A. Yes, I did.
Q. And so you were one of the staff people who was allowed to go into his room to straighten it up or do whatever needed to be done; is that correct?
A. That's correct.
Q. And also to supervise people who would be doing that; is that right?
A. Yes.
Q. All right. Did you ever see any bottles of alcohol or other evidence of alcohol strewn about? Can you explain what you might see?
A. I don't recall.
Q. Okay. So you might see a glass or something but you wouldn't see -- you wouldn't see alcohol just lying around his room?
A. No.
Q. All right. And let me also ask you about Mr. Jackson and his personal behavior. Would you say -- can you describe his behavior as far as being outgoing or shy or --
MR. ZONEN: I'm going to object as irrelevant, Your Honor, and vague. 9459

THE COURT: Sustained.
MR. SANGER: On vague?
THE COURT: Both.
MR. SANGER: Both? Okay.
Q. Did you have any occasion to observe whether or not Mr. Jackson would change his clothes in front of anyone? For instance, if you were in the room cleaning, would he be changing his clothes in there?
MR. ZONEN: Judge, that's irrelevant as to whether he would change his clothes in her presence.
THE COURT: Sustained.
MR. SANGER: All right.
Q. Were there occasions where you came in and Mr. Jackson might be in the process of changing his clothes, changing a shirt or something?
A. No. He was very private.
MR. SANGER: All right. Okay. I have no further questions.

CROSS-EXAMINATION
BY MR. ZONEN:
Q. Miss Goforth, you were recently interviewed by an investigator for the defense; is that correct?
A. Yes, I was.
Q. And you were asked questions about that conversation that you had with Janet Arvizo; is that right?
A. Yes, I was. 9460

Q. Now, that conversation that you had with Janet Arvizo was approximately August of 2000, was it?
A. I don't recall exactly. No.
Q. When did you leave Neverland Ranch?
A. I left in 2002.
Q. All right. You only saw Janet Arvizo on one single occasion when she was at Neverland; is that right?
A. One occasion, yes.
Q. And she was there with her husband and her three children; is that correct?
A. That's correct.
Q. They were there for one night, two nights?
A. They were there for a couple of days.
Q. Couple days? Did you interact with her on more than one occasion during that time?
A. Well, yes.
Q. Now, you told the investigator for Mr. Jackson not that she was prepared to move to the valley, but that she was prepared to sleep in her car outside Neverland; is that right?
A. Yes.
Q. Did you just change it to say that she was prepared to live in the valley?
MR. SANGER: Objection; argumentative.
THE COURT: Sustained.
THE WITNESS: No, I wasn't able to complete 9461

my --
THE COURT: Just a moment. Just a moment.
I sustained the objection.
Next question.
Q. BY MR. ZONEN: Now, the statement that you gave was that she was prepared to sleep in her car right outside the doors to Neverland; is that right?
A. Yes.
Q. All right. Now, did you ask her if she had a car?
A. She stated that she didn't even have a car and that they were living in separate quarters.
Q. All right. So she told you she didn't have a car but she would sleep in the car she didn't have outside the ranch?
MR. SANGER: Objection; argumentative.
THE COURT: Sustained.
Q. BY MR. ZONEN: Ma'am, what exactly did she tell you? Did she tell you she had a car?
A. No, she didn't say that she had a car.
Q. She told you she was going to get a car?
A. No, she didn't say that. She said that -- the conversation was, she asked me if she could have a job at Neverland. I told her that it was a long ways from -- I assumed that they lived in the Los Angeles area. And it was a long ways to come. She said that she would move to the valley in order to be closer to the ranch. And I told her that the 9462

rents and that were very expensive in the area.
Just trying to dissuade her from this.
And she said, “Well, I’ll come and I’ll
sleep in my car if I have to. I just need money. I
need to work.”
Q. Go ahead.
A. “I need” -- “I need a job. I need to work.
We’re living in separate quarters, and we need the
money. Gavin’s very sick,” to that effect.
Q. All right. Did you take a job application
to give her?
A. No, I did not.
Q. All right. You decided at that time that
she wasn’t qualified to clean rooms at Neverland?
MR. SANGER: Objection; argumentative.
THE COURT: Sustained.
Q. BY MR. ZONEN: Did you make a determination
as to why she shouldn’t work at Neverland?
A. Well, I just saw her being a guest and
everything, that it wasn’t appropriate to -- I had
several guests come to the ranch and ask. Everybody
thought it was fun to work at the ranch. And --
Q. But she asked specifically for a job as a
maid; is that right?
A. Yes, she did.
Q. About that time that job made about what,
eight dollars an hour?
A. Yes. 9463

Q. You knew, did you not, that she, in fact, had a job, was working in Los Angeles at the time?
A. No, I did not.
Q. And in fact, she had an apartment at that time?
A. I didn't know. I didn't -- my job was not to stand and carry conversations with the guests and that. I was trying to dissuade her from, and get away -- out of the conversation.
Q. Miss Goforth, your job at Neverland Ranch ended when?
A. In 2002.
Q. And that ended because you were being disciplined for stealing; is that right? Is that right?
MR. SANGER: Objection; lack of foundation.
MR. ZONEN: We're going to get there.
MR. SANGER: And move to strike counsel's remarks.
THE COURT: Sustained.
Q. BY MR. ZONEN: Were you, in fact, suspended from your job because you were taking things that you weren't entitled to take?
A. I was suspended from my job over the sale of some furniture that I thought was allowed to be done. I was just doing what I was told by another party.
Q. All right. So you took some items from 9464

Neverland and they then accused you of taking it
without the permission of the owner; is that right?
A. I didn't personally take the items.
Q. Somebody else took them and you sold them?
A. I didn't sell them. It was arrangements
that were made through someone else.
Q. And ultimately who made the decision to
discipline you for that?
A. I believe Mr. Jackson.
Q. All right. And thereafter, you terminated
your position voluntarily; is that right?
A. That's correct.
Q. Because you were offended as to how you were
treated?
A. Yes, I was.
Q. In fact, there's a fair amount of
controversy at Neverland about who can take what and
when they can take it; is that right?
MR. SANGER: Objection. Vague and
argumentative.
THE COURT: Overruled.
You may answer.
Q. BY MR. ZONEN: Please answer the question.
A. Could you repeat the question?
MR. ZONEN: Could the reporter read that
back?
THE COURT: I'll have the reporter read it
back. 9465

(Record read.)
THE WITNESS: I don't believe so. I believe that no one should take anything at any time without Mr. Jackson's permission.
Q. BY MR. ZONEN: And -- all right. But a lot of people have been accused of taking things from Neverland; is that right?
MR. SANGER: Objection. Vague as to time and --
THE COURT: Sustained.
Q. BY MR. ZONEN: You've actually turned in people for taking things at Neverland, haven't you?
A. No.
Q. You've never turned in people for taking things at Neverland?
A. Not personally myself, no.
Q. Didn't you turn in Ramon Velasco for taking something at Neverland?
A. No, I did not.
Q. And you never went back to work at Neverland after that; is that correct?
A. That's correct.
MR. ZONEN: No further questions.

REDIRECT EXAMINATION
BY MR. SANGER:
Q. All right. With regard to this business about selling items from Neverland, did you ever 9466

sell anything from Neverland for your own personal benefit?
A. I did not.
Q. Was there somebody else who was in a position higher than yours who directed that certain items be sold?
A. Yes, there was.
Q. And was -- were they being sold for your benefit?
A. No.
Q. They were being sold for the benefit of the ranch?
A. Yes, they were.
Q. And the problem was that apparently --
MR. ZONEN: Objection; leading.
MR. SANGER: That's true. Let me withdraw the beginning of that. I didn't get it out. But it would have been leading, I agree.
Q. What was the problem that gave rise to the people involved in selling these items eventually being disciplined in some way or being reprimanded?
MR. ZONEN: That's vague and compound.
THE COURT: Overruled.
You may answer.
THE WITNESS: Apparently Mr. Jackson didn't want the furniture sold.
Q. BY MR. SANGER: Okay. Were the proceeds of the sale intended to go to Mr. Jackson and to the 9467

ranch?
A. For the ranch, yes.
Q. Okay. So nobody was stealing anything; is that correct?
A. That's correct.
MR. SANGER: Okay. Thank you. I have no further questions.

RECROSS-EXAMINATION
BY MR. ZONEN:
Q. Can we assume you told Mr. Jackson all the things you just told us about this incident?
A. No, I did not.
Q. You did not? Did you have any conversation with Mr. Jackson thereafter?
A. No, I did not.
Q. How did you find out that it was Mr. Jackson who disciplined you?
A. I assumed that it was. I didn't know that for a fact.
Q. Did you tell anybody about what had happened?
A. No, I immediately left the ranch.
MR. ZONEN: No further questions.
MR. SANGER: And I have no further questions, Your Honor.
THE COURT: Thank you. You may step down. Call your next witness. 9468

MR. SANGER: Call Violet Silva.
THE COURT: Please remain standing. Face the clerk here and raise your right hand.

VIOLET GAITAN SILVA
Having been sworn, testified as follows:

THE WITNESS: Yes.
THE CLERK: Please be seated. State and spell your name for the record.
THE WITNESS: Violet Gaitan Silva. Violet, V-i-o-l-e-t; Gaitan, G-a-i-t-a-n; Silva, S-i-l-v-a.
THE CLERK: Thank you.

DIRECT EXAMINATION
BY MR. SANGER:
Q. I'll let you get some water there first. So take your time.
A. Thank you.
Q. All right. Miss Silva, how are you employed?
A. I'm employed by Neverland Ranch as a safety coordinator at this time.
Q. Okay. Now, everybody's having this problem in this courtroom. You have to sit real close.
A. Okay.
Q. It's not -- there we go. That might help. And then when the air conditioner is on it 9469

makes it a little harder to hear.
A. All right.
Q. So repeat that again, please.
A. I am employed by Neverland Ranch as a safety coordinator at this time.
Q. And where is your office?
A. My office is located in the administration building.
Q. Where is the administration building with respect to the ranch house, I mean, to the actual house, Mr. Jackson's house?
A. It's southwest approximately less than a quarter mile.
Q. Is it up on a hill?
A. Yes.
Q. All right. And is it outside the manicured grounds of Neverland?
A. I would say the immediate grounds, yes.
Q. Not to say the administration area isn't manicured, but there is a place that's all grass and pastures and so on, right?
A. Yes.
Q. And it's outside of that, correct?
A. Correct.
Q. Can you describe the kind of structure that houses the administrative offices?
A. It's a converted barn. And it has one large office area with a conference area. It has two 9470

smaller offices. It also stations a fire engine in the bay and one other small office and two -- three bathrooms, excuse me, and some storage areas.
Q. Okay. So let's start with the fire truck. That's the fire station as it were; is that correct?
A. The fire brush truck is located in the administration building.
Q. All right. So -- and at this time there's one fire truck; is that right?
A. Yes, it's a brush truck.
Q. And on prior occasions, how many fire trucks have been there?
A. We've had as many as two.
Q. All right. Now, when you talk about the brush truck, is it a fully outfitted fire truck?
A. Yes.
Q. All right. And do you have trained fire personnel to man the -- or staff, I should say, the fire truck?
A. Yes. We have trained firefighter/EMTs.
Q. You said EMTs?
A. EMTs, yes.
Q. I'm having a little trouble hearing at the end of your sentences.
A. Okay.
Q. All right. Now, the administrative office is -- you talked about a number of offices being in there. You have an actual executive office there 9471

right now; is that correct?
A. Yes. I share it with the fire supervisor at this time.
Q. All right. And then there's a staff area where an administrative assistant sits; is that right?
A. Yes, and the ranch manager.
Q. All right. And then there's a separate office for the ranch manager, or the ranch manager is out --
A. No, they have separate offices.
Q. Okay. At the current time, who is the administrative assistant up there?
A. Tracy Chapman.
Q. And does she have a large phone?
A. Yes.
Q. Okay. Now, in the years -- did I ask you when you started there --
A. No.
Q. -- I think I did. Okay. When did you start working there?
A. July 1st, 1991.
Q. We'll go back over what you've done there in a minute.
A. Okay.
Q. But in the years you've been there, have you had occasion to see the different phones throughout the ranch? 9472

A. Yes.
Q. All right. And are there some regular,
smaller handset phones throughout the ranch?
A. Yes.
Q. Is the main phone in the administrative
office larger than those phones?
A. Yes. There's a regular small phone and
there's also a larger console type of phone.
Q. Would that be the main phone for the phone
system?
A. No, it's not.
Q. All right. Where is the main phone?
A. The calls are mostly taken through the
security gate, and also at Miss Chapman's desk,
depending on which number the person is calling.
Q. When I said "main phone," I was asking about
the equipment. But you're saying that calls are
answered at some of the smaller handsets; is that
correct?
A. Yes.
Q. And one of the places where calls are
routinely answered is the front gate?
A. Yes.
Q. And the other would be at Miss Chapman's
desk?
A. Yes.
Q. All right. The ranch manager -- who's the
ranch manager at the present time? 9473

A. Joe Marcus.
Q. And does he have an office there in the same administrative building?
A. Yes.
Q. When did you obtain the position that you have now?
A. November of 2004.
Q. Let's go back to when you started at the ranch. And actually, before you started at the ranch, did you have any particular training and experience?
A. I had graduated from Allan Hancock Police Academy in 1989, December. And shortly after, well, '91, I applied for a position out at the ranch as a security officer, which I started July 1st of '91.
Q. All right. So you went to the POST academy?
A. Yes.
Q. Police officer training academy, correct?
A. Yes.
Q. Did you receive the certificate?
A. I graduated but I did not receive the certificate, because I did not work full time as a police officer. So I guess my answer would be no to that, I did not receive the POST certificate.
Q. So you did the education and the training through Allan Hancock, but you didn't do the inservice training as a police officer; is that correct? 9474

A. Correct.
Q. All right. And do you consider yourself to be a peace officer or a police officer?
A. No.
Q. All right. And have you ever?
A. No.
Q. All right. So you went to work as a security guard at the ranch --
A. Yes.
Q. -- in 1991, correct?
A. Yes.
Q. Did the ranch have a security staff -- well, let's start with that. You weren't the only person?
A. No.
Q. Okay. And was the staff organized according to rank?
A. Yes.
Q. Who was the chief of security at that time; do you recall?
A. Terry Cooney.
Q. And between 1991 and 2004, did you continuously work in the security department?
A. Yes.
Q. Can you tell us briefly what -- how you progressed through the department?
A. In October of '91, I was promoted to a relief supervisor position, which would carry the rank of corporal. And in January of '94, I believe, 9475

I was promoted to a full-time shift supervisor, which has the rank of sergeant. In May of '97, I was promoted to the chief's position of security. And in June of '98, I assumed the fire chief position as well.

Q. All right. And you -- when you were finally moved into this other administrative position, as of that time in 2004, you were the chief of both the security and the fire department; is that correct?

A. Yes.

Q. All right. Now, you know Mr. Jackson --

A. Yes.

Q. -- correct?

Do you know Mr. Jackson well?

A. I would say so.

Q. All right. Do you spend -- in the course of your employment, do you spend a lot of time talking with Mr. Jackson?

A. No.

Q. All right. And can you explain what the policy is for employees at the ranch as far as having contact with Mr. Jackson?

MR. SNEDDON: Object as immaterial, Your Honor.

THE COURT: Overruled.

You may answer. You may answer.

THE WITNESS: I'm sorry, can you repeat the question? 9476

THE COURT: I can have it read back.
MR. SANGER: Thank you.
(Record read.)
THE WITNESS: Our contact is limited to him making requests. And other than that, if we have any concerns about the operation of the ranch, we channel those through the ranch manager.
Q. BY MR. SANGER: Now, that policy would pertain to security, correct?
A. Yes.
Q. It would pertain to fire; is that right?
A. Yes.
Q. Did it pertain to the other departments as well?
A. Yes.
Q. Okay. So housekeeping?
A. Yes.
Q. The zoo?
A. Yes.
Q. Grounds or maintenance?
A. Yes.
Q. Did I leave any out?
A. There's a few.
Q. Okay. There's some more. But all of the different units out there have their own chain of command, as it were; is that correct?
A. Correct. There's employees, a department head for each department, and each department is 9477

directly supervised by the ranch manager.
Q. And who is the ranch manager at the current time? Did I ask you that?
A. Yes. Joe Marcus.
Q. So if somebody in your department -- as the chief of security, if somebody in your department had some question about procedure or how things ought to be done, where would you expect them to go?
A. I expect them to immediately go to their shift supervisor, to whoever the chief is at the time. If I was in charge, then to me. If I couldn't answer the question, then I would go to Mr. Marcus with a question.
Q. All right. Did you ever sit down with Mr. Jackson and ask him how he'd like to have security taken care of at the ranch?
A. No. But if he had a suggestion, he sure would let me know.
Q. Okay. When you had -- when you made policy decisions about security, would you discuss those with Joe Marcus or with somebody else, or how would you do that?
A. I would discuss those with Mr. Marcus.
Q. All right.
A. And my shift supervisors as well.
Q. Now, you said that Mr. Jackson would let you know. Did Mr. Jackson from time to time let people know that he thought something ought to be done at 9478

the ranch?
A. Yes.
Q. Okay. And would the staff attempt to fulfill those requests?
A. Yes.
Q. All right. In all the time that you were there, did Mr. Jackson ever ask you to do anything that you thought was inappropriate?
A. No.
Q. All right. Now, by the way, you've come here pursuant to a subpoena; is that correct?
A. Yes.
Q. And you also interviewed with law enforcement; is that correct?
A. Yes.
Q. And you have told both sides that you were going to tell the truth to both sides no matter what; is that correct?
A. Yes.
Q. Is that your intention, to tell the truth here on the stand?
A. Absolutely.
Q. Now, in the course of the time that you worked there -- I asked you if Mr. Jackson ever asked you to do anything that was inappropriate. During the course of the time that you worked at the ranch, did you ever observe anything that appeared to you to be illegal or inappropriate? 9479

A. No.
Q. And if you had, what would you have done about it?
A. Well, I would have at the time taken into consideration what the action was and addressed it appropriately.
Q. Now, before you were a chief of security, if you saw anything inappropriate or illegal, would you have reported it to a supervisor? Before you were chief of --
A. Oh, absolutely, yes.
Q. And again, you told us about the chain of command so --
A. Yes.
Q. And as the chief of security, if you saw anything inappropriate or illegal, what would you have done? Who would you have reported it to?
A. I would have followed my chain of command, and notified my supervisor, who was Joe Marcus.
Q. All right. Now, during the course of the time that you worked in security and you've been the chief of security -- in fact, I'm really drawing on that experience as your involvement in security there, whatever rank you had during the period of time. What would happen if you -- if anybody in security observed something, let's say a golf cart accident - we've heard about those - what would happen? 9480

A. Well, we would first immediately make sure -- whoever the driver was, make sure they weren't injured. That would be our first concern. If they were -- then we would attend to that. Afterwards, if there was no injury or we took care of the injury, then we would either make sure that the vehicle, the cart, whatever it was, was still roadworthy. If it was not, we would remove it and take it to the mechanic's shop and we would make a report as well. And depending on why it happened, if it was deemed necessary, we would take that privilege away from that person if they weren't handling the cart properly.

Q. All right. Let's start with the report. Is there a formal reporting system that has been in place at the ranch since you started there as a security officer?

A. Yes.

Q. And can you explain what that is?

A. Well, depending on the incident or the severity of it, if it's a medical incident, then a report is made, regardless of how minor or insignificant it may seem. If it's a damage report, we will do the same. If we consider that there may be a hazard involved, then we address the hazard as well. So -- and just write down a line, if there's a theft, if there's something missing, if we have a trespasser. It could be anything. 9481

Q. All right. Now, with regard to the different kinds of reports you talked about, there are medical reports. There's actually a form to make a medical report; is that correct?
A. Yes.
Q. And is that filled out every time the EMTs are called to attend to somebody who might be injured?
A. Yes.
Q. All right. Now, you said there's EMTs. Firefighters/EMTs. Do you generally have an EMT on the property at all times?
A. We try to make sure that that's covered. It's a priority for us. So we do.
Q. If anybody is injured anywhere on the ranch, whether it's an employee, a guest, Mr. Jackson, you have somebody there who can give first aid?
A. Yes.
Q. Do the -- if somebody is injured, do the EMTs make the final call as to whether or not any further medical assistance is needed?
A. They'll make the assessment, but a patient always has the right to refuse treatment. So if that's what they do, then we can just ask them to, you know, seek further treatment. If not, then that's where it stops. If we feel they absolutely need to go, in the event of a work injury, then they're required to go. 9482

Q. All right. Now, when you say “go,” we’re talking about going to the local hospital or getting a doctor or --
A. Correct. Or call whatever means is necessary, whether it’s ambulance or outside of our department with county fire.
Q. And have you had occasion at times to actually call in ambulances to the ranch?
A. Yes.
Q. Even, I think, a medical helicopter evacuation?
A. Yes.
MR. SNEDDON: I’m going to object as immaterial and irrelevant, Your Honor.
THE COURT: Do you have a --
MR. SANGER: That was actually the last question in that area. But it does tie into some other evidence.
THE COURT: All right. I’ll overrule the objection.
MR. SANGER: All right.
Q. Now, you indicated that in addition to the medical reports, that the -- you also have reports with regard to property damage, correct?
A. Yes.
Q. And then you indicated that there are occasions where a guest -- let me withdraw that. What happens if a guest is not being safe 9483

with some of the equipment?
A. Well, then we temporarily give them a cooling-off time, or we would remove the equipment from them.
Q. And why would you do that?
A. For their safety.
Q. Now, is one of the concerns in your department safety of the guests?
A. Yes.
Q. Does that pertain to adults or children or both?
A. Both.
Q. And how is that concern for safety implemented in your department?
A. Well, when they're initially given a cart to drive, or a vehicle, or a quad runner, we give them instructions on how to operate the equipment safely. You know, on occasion it does happen where they get a little rambunctious and we feel like maybe they can't control it properly, then we give them a warning, and advise them again of the proper use of the equipment. And if they continue to either cause damage to the cart or other things, then we usually pull the equipment.
Q. Now, do you have to ask Mr. Jackson first before you do that?
A. No.
Q. And if you see kids who are not being 9484

supervised by their parents on the ranch, does security try to keep -- let's put it this way: Is there any additional attention given to those kids by security?
A. Well, I would say that's just our priority in general. So -- it's what we're doing there. So it's not -- we don't have heightened awareness. It's just what we are trained to do and what we're there for. So that's a constant regardless of whether their parents are there or not.
Q. So if you see kids -- whether the parents are there or not, if you see kids riding the carts and you think -- in the morning you saw somebody going a little fast, is security going to tend to watch that kid a little more closely?
A. Sure.
Q. All right. Do you sometimes make entries in the gate logs?
A. Yes.
Q. Now, we've seen something about gate logs, so we don't have to absolutely go back to square one, but can you describe the purpose of the gate logs and how they're kept?
A. The purpose of the gate logs is we have three different sheets, and it's evolved over time, depending on what our needs are for our department. It's mainly used to document in-and-out times for our employees, contractors, guests' arrival. 9485

It also documents our own activity on the ranch as far as our work that we do, so if we have to refer back to a time or a directive that is given to us, we can refer back to it.

Q. How many security officers are on duty generally? Let's say in recent years, in the 2000s, how many security officers would be on duty at any given time during the day?

A. We try for four. Four is what we -- is a good number for us.

Q. All right. Would that be 24 hours a day?

A. Yes.

Q. And can you describe what the duties of the four different officers would be?

A. Well, they would come in and get whatever equipment they need. They would either report to three different posts that we have, which is at the front gate, the main house, or a mobile patrol. Their duties vary at each of the stations. The main gate is -- primarily their function is to ask guests -- authorize guests or contractors. They also dispatch a request from the owner or another department that needs something. We answer the phones. A lot of phone calls come through there after hours as well, so --

Q. So you have -- you generally have one officer mobile - all right? - one in the gatehouse, and where would the other two be? 9486

A. One would be at the house and hopefully the other one would be a supervisor. So most of the times it would be a supervisor.
Q. You talked about the front gate. There's a gatehouse there; is that correct?
A. Yes.
Q. And can you describe that building, about how big it is?
A. The building is probably about 15 square feet. It has a small eating area, a desk area, a bathroom, has a phone. T.V.
Q. Okay. I am thinking 15 square feet, that's kind of small.
A. It works.
Q. Okay.
A. It's all we need.
Q. All right. So there's a desk in there; is that correct?
A. Yes.
Q. And there's a bathroom; is that right?
A. Yes.
Q. And there's an area where you can sit and watch a T.V., correct?
A. Yes.
Q. Now, during the course of the shift or during the course of a day -- let's put it this way: During the day, how many shifts are there for security? 9487

A. We work a 12-hour shift, so we have two shifts, starting from 6 a.m. to 6:30 p.m., from 6 p.m. to 6:30 a.m.
Q. All right. And I take it you have the required breaks, lunch breaks and other breaks, in the middle of that shift?
A. Yes.
Q. Now, in addition to security, do you have fire on duty?
A. Yes.
Q. And how many fire people do you have?
A. How the department is worked is that our firefighters do security work. So most of them, or the majority of our security officers, are firefighter/EMTs.
Q. So they also have the EMT training?
A. Yes.
Q. Did that change? Did you have a separate fire staff at one time?
A. Yes. From the time I was first hired in '91, the security department was separate from the fire department. And in '98, June '98, when I assumed the fire chief duties, our department was combined at that time.
Q. By the way, Brian Barron, do you know that name?
A. Yes.
Q. Do you know Brian Barron? 9488

A. Yes, I do.
Q. And is he a police officer?
A. Yes.
Q. Do you recall him working at the ranch?
A. Yes.
Q. At the time he worked at the ranch, was it known to everybody in the security department that he was, in fact, a sworn peace officer?
A. Yes.
MR. SNEDDON: Object; calls for speculation.
THE COURT: Overruled.
Q. BY MR. SANGER: Now, going back to the front gate issue, where are the gate logs actually kept during the day?
A. During the day, the gate logs are kept there, and they're actually kept there for the entire week. And on Monday morning, they're picked up.
Q. And where do they go after that?
A. They go to the administration office.
Q. And the administration office, again, is the building up on the hill?
A. Yes.
Q. All right. Now, there's been discussion about a security office at the end of the building that has the garage, Mr. Jackson's office, and then it has the video library upstairs.
A. Yes. 9489

Q. Can you describe that security office?
A. The -- it has two separate rooms. The first office is approximately a nine-by-ten room. It has a desk, a computer, a counter space that holds our equipment and other things, like paper towels and napkins.
The back area is with lockers and a table for eating and refrigerator and microwave.
Q. All right. Now, is this a staff area?
A. Yes.
Q. All right. And this is part of that structure. Does it have a door that you enter from the outside or do you go inside that structure to enter?
A. No, you enter from the outside.
Q. All right. And the door that you enter is away from the house; is that correct?
A. Yes.
Q. What is kept generally -- in the 2003 time period, what is kept at that location?
A. At that location -- excuse me, I forgot to mention, we do have a file cabinet there. We have a file cabinet that holds reports, our confidentiality agreements. We also have our gate logs in there for the entire year. They're housed in there. And whatever little bits of equipment that we may have in that storage.
Q. All right. Now, you mentioned a 9490

confidentiality agreement. Can you explain what that is?
A. The confidentiality agreement is a four-page contract that all guests or anyone entering Neverland reach -- that read, that read it, and they have to be over the age of 18. The contract, in a nutshell, is that you agree to keep your visit private and confidential.
Q. All right. Is it designed to conceal illegal activity?
A. No.
Q. What's the purpose of the confidentiality agreement?
A. The purpose of the agreement is to keep you from profiting from your experience there, selling to a magazine or any sort of media.
Q. Okay. Does it also include a provision that people are not supposed to take pictures while they're there on the ranch?
A. Yes, they agree to not use any sort of recording agreement.
Q. And the purpose of that, not allowing any kind of recording equipment or pictures, is what?
A. Is to prevent probably the profit of sale as well.
Q. So if you didn't have that as the chief of security, you would expect that pictures and recordings from the ranch would end up in the media, 9491

on television and in magazines otherwise; is that true?
A. Yes.
Q. Is any of that designed to conceal any kind of untoward or illegal activity?
A. No.
Q. All right. Now, going back to how the security system is set up -- I'm sorry, the security operation is set up, you mentioned the front gate, and we talked about that. The person -- well, let's talk a little more. The person down at the front gate, I think you said, answers the phones?
A. Yes.
Q. And that's on a regular little handset phone; is that correct?
A. Yes.
Q. You just forward the calls from there?
A. Yes.
Q. The person at the front gate also has the responsibility of letting people in and out?
A. Authorized persons only.
Q. All right. Now, you mentioned "mobile." What does "mobile" mean?
A. Mobile patrol is a truck that patrols the property. We also patrol about three miles of the front perimeter as well. They patrol the property and make sure we don't have trespassers, that our employees are safe, there are no other hazardous 9492

conditions going on.
We also respond to alarm calls on the property. They also have the duties of locking up certain buildings and securing the ranch at a certain hour.
Q. Let's talk about patrolling the front of the property. Does that mean going out on Figueroa Mountain Road?
A. Yes.
Q. And why do you do that?
A. Well, occasionally we find vehicles that are parked outside of our fence line. And that would be an indication that perhaps we have a person who's jumped the fence and might be on property.
Q. Now, part of the fence is just a split-rail fence, is that correct, in the front?
A. Yes, approximately a half a mile of it is just your typical split-rail fencing.
Q. So it's not a wire meshed fence?
A. No.
Q. And is it fairly easy for people to go through that fence?
A. Through or over.
Q. Now, there are parts of this ranch -- how big is the ranch?
A. The ranch is 2700 acres, or approximately five square miles.
Q. All right. And is there any kind of a 9493

commercial operation on the ranch?
A. Yes.
Q. What is that?
A. We have cattle on the ranch.
Q. All right. Is that something you -- you have your own cattle, Michael Jackson's cattle?
A. No, part of the property is --
MR. SNEDDON: I'm going to object as immaterial and irrelevant.
MR. SANGER: That has to do with the fencing.
THE COURT: Overruled.
You may answer.
THE WITNESS: Yes, it's leased by a rancher who has cattle on the property.
Q. BY MR. SANGER: All right. And are there parts of the property that are fenced to keep the cattle in?
A. Correct.
Q. And there are parts of the property that are fenced to keep the cattle out, I take it?
A. Correct.
Q. When you go into Mr. Jackson's home area, let us say -- do you have a term for that, the --
A. I would say beyond the arched gateway, we call it the main house area.
Q. And the arched gateway, is that the golden gates? 9494

A. The golden gates.
Q. The black gates with gold on them? All right.
Now, is there fencing designed to keep people on the ranch so that they cannot get off?
A. No.
Q. The golden gate that you described, does that automatically open if you approach it?
A. You would have to approach it by a vehicle, with a vehicle.
Q. Okay. If you have a vehicle, it automatically opens?
A. Yes.
Q. There's no requirement that you ask anybody or push buttons or anything else, right?
A. No. There's also a way to go around the gate as well, on foot.
Q. Okay. We're going to get to that. But as far as the cars --
A. Okay.
Q. That's all right.
As far as cars are concerned, whether you are coming in or you are going out, if you just pull up, it trips a sensor and the gates automatically open, correct?
A. Right. Depending on the size of the vehicle, it senses the weight or the metal. And a golf cart could open it, could activate it, as well 9495

as a quad runner.
Q. And in fact, golf carts and quad runners do go through that gate; is that correct?
A. Yes.
Q. Now, you said you can also walk around the gate; is that right?
A. Yes.
Q. Is there any kind of a locked fence that you have to get permission to go through to go past that gate?
A. No.
Q. All right. All right. So you said the mobile -- it's -- right now it's a little pickup truck; is that correct?
A. Yes, a Ford.
Q. I'm sorry?
A. A Ford Ranger.
Q. And over the years it's been a different type of vehicle, I would take it?
A. Mostly that, though.
Q. Mostly a small Ford pickup?
A. We did have a Nissan as well.
Q. Some kind of pickup truck, right?
A. Yes.
Q. Besides patrolling from time to time Figueroa Mountain Road to see if there are vehicles or possible intruders, does the mobile also patrol within the ranch? 9496

A. Yes.
Q. And just tell us generally where the mobile unit would go.
A. Well, the ranch has two main roads that loop throughout the property, and they meet about a quarter mile from the front gate. From there -- from that point to the main residence is another quarter mile. So we would patrol that entire area. So we would do a loop approximately of about five miles starting from the house security office to the furthest part of the ranch, back out to the front road and back.
Q. All right. Now, you say “the furthest part of the ranch.” Do you go up past the theater into the zoo area?
A. Yes, the furthest point would be the train barn or another -- another area where we have a stockpile of manure, compost, gravel and sand.
Q. All right. Now, if you have two other people on duty, you said one might be a supervisor and then you’d have another security officer; is that correct?
A. Yes.
Q. What would they do? We’ve got the front gate person who stays at the front gate. You’ve got mobile. What would the other two people be doing on a typical shift?
A. We always have someone located at the main 9497

house.
Q. “Located at the main house” would be sitting in the security house at the end or walking around or both?
A. Both.
Q. And what does the person do who’s there at the main house? Can you describe what their duties would generally be? And they differ at night and daytime, you can make that distinction.
A. Generally what they do is they secure -- they have the responsibility of securing that area, which means doing a foot patrol around the house, which includes the main residence, the rec room, the guest units, and as far away as maybe another quarter mile walking, if it’s necessary. They also accommodate guests’ requests. If, you know, something’s needed, they assist the house staff as well.
Q. So if somebody calls and says, you know, “I’d like to go into the theater and the theater is locked,” is that something that security might take care of?
A. Yes.
Q. And if a guest calls and requests some sort of refreshments, what would -- just tell me what happens. Somebody says, you know, “We want lunch. It’s lunchtime. Can we please have lunch?” What would you do? 9498

A. We would call the kitchen and let them know the guests are ready for lunch.
Q. Now, you said “call.” Do you have radios?
A. Yes.
Q. And what kind of radios do you have? Not the brand, but, you know, is it a -- does it hit a repeater or what?
A. Yes, it hits a repeater. We also have radio to radio within a mile distance.
Q. All right.
A. We have two channels.
Q. So one channel goes off a repeater somewhere on a hill, and you’re able to make communication that way?
A. Yes.
Q. And then you can do the car to car?
A. Yes.
Q. All right. Now, are the radios used just by security or by other departments?
A. No, most of the staff carries radios.
Q. And they all have the two channels, the same two channels?
A. No, we have two separate channels. We have a channel strictly for security and fire and the remainder of the staff operates off another channel.
Q. So you have two main channels off the repeater and then one car to car, or station to station? 9499

A. Sure.
Q. Okay. Is security often called for the purpose of arranging -- we talked about lunch. Could security get a call about lunch, for instance?
A. Yes.
Q. And then you would then forward that to housekeeping or to the cook?
A. Yes. They would either come into our office and request it, if they wanted it somewhere different than the kitchen, a lot of our guests know that they can call the front gate and make a request from there, and then the front gate would dispatch whoever is appropriate to make -- fulfill that request.
Q. So the guests would call the phone number?
A. Yes.
Q. All right.
THE COURT: All right, Counsel.
(Recess taken.)
--o0o--

REPORTER'S CERTIFICATE

THE PEOPLE OF THE STATE)
OF CALIFORNIA,)
Plaintiff,)
-vs-) No. 1133603
MICHAEL JOE JACKSON,)
Defendant.)

I, MICHELE MATTSON McNEIL, RPR, CRR, CSR #3304, Official Court Reporter, do hereby certify:

That the foregoing pages 9441 through 9500 contain a true and correct transcript of the proceedings had in the within and above-entitled matter as by me taken down in shorthand writing at said proceedings on May 9, 2005, and thereafter reduced to typewriting by computer-aided transcription under my direction.

DATED: Santa Maria, California, May 9, 2005.

MICHELE MATTSON McNEIL, RPR, CRR, CSR #3304

SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF SANTA BARBARA
SANTA MARIA BRANCH; COOK STREET DIVISION
DEPARTMENT SM-2 HON. RODNEY S. MELVILLE, JUDGE

THE PEOPLE OF THE STATE OF)
CALIFORNIA,)
Plaintiff,)
-vs-) No. 1133603
MICHAEL JOE JACKSON,)
Defendant.)

REPORTER'S TRANSCRIPT OF PROCEEDINGS

MONDAY, MAY 9, 2005

8:30 A.M.

(PAGES 9502 THROUGH 9678)

REPORTED MICHELE MATTSON McNEIL, RPR, CRR, CSR #3304
BY: Official Court Reporter 9502

APPEARANCES OF COUNSEL:

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-and-
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Santa Barbara, California 93101

The Interpreters: Rose O'Neill Doris Vick

I N D E X

Note: Mr. Sneddon is listed as “SN” on index.
Mr. Zonen is listed as “Z” on index. Mr. Auchincloss is listed as “A” on index.
Mr. Mesereau is listed as “M” on index. Ms. Yu is listed as “Y” on index.
Mr. Sanger is listed as “SA” on index.

DEFENDANT’S WITNESSES	DIRECT	CROSS	REDIRECT	RECROSS
SILVA, Violet	9558-SN	9597-SA	9614-SN	
		9618-SA		
(Further)				
VELASCO, Ramon	9622-SA	9633-A		
MARCUS, Joseph	9635-SA			

1 E X H I B I T S
2 FOR IN DEFENDANT'S NO. DESCRIPTION I.D. EVID.
3
4 5030 Map of Solvang area 9671 9672
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MR. SANGER: May I proceed?
THE COURT: Yes.
Q. BY MR. SANGER: Okay. You've described the patrol -- you started to describe the patrol around the house, and I think you said the person who's assigned to the house would be in that security office at the end of the video library building, garage building, and would also walk around the house?
A. Yes.
Q. Does that mean walk inside the house?
A. No.
Q. Did security walk inside the house from time to time?
A. Yes.
Q. Was that part of the regular patrol, to walk inside the house?
A. No.
Q. When you say "walk around the house," then you literally mean around the outside of the house?
A. Yes.
Q. And what was the purpose of doing that?
A. To make sure we didn't have any hazards or uninvited guests or trespassers.
Q. Was it important to make sure that the house, in general, was secure?
A. Yes.
Q. Now, during the time that you've been there, 9506

have there been trespassers located on the ranch?
A. Yes.
Q. And how close to the house did they get?
A. We've had one trespasser who did enter the house.
Q. And where was that person ultimately found?
A. In the very top floor of the main house, in the train room.
Q. So right up above where the children's rooms are, Prince and Paris's rooms are?
A. Yes.
Q. So that was a very private part of the house?
A. Yes.
Q. And without going into a lot of detail, who was this person? Was this a fan or --
A. We determined she was not from this country. She was a fan. We couldn't communicate with her very well, because she didn't speak English, so she was arrested.
Q. You speak Spanish yourself?
A. Yes.
Q. So she didn't speak English or Spanish, I take it?
A. I believe she spoke German, which I do not speak.
Q. So sort of a -- not a normal person to sneak into somebody's house, though? 9507

A. No.
Q. And do you know how long that person was there before she was located?
A. I'd estimate she was there approximately ten hours.
Q. Have there ever been any people located on the ranch who had weapons?
A. We recently did arrest someone who had a weapon. It was not loaded with anything. It was a disabled weapon.
Q. A handgun?
A. Handgun, yes. Nine-millimeter.
Q. Now, in your years of working in security, have you ever performed security functions for Mr. Jackson off of the ranch?
A. Yes.
Q. And where would that be?
A. I've taken them to the Lompoc fireworks show. I think I've maybe done that two or three times.
Q. Okay. If -- have you ever been gone on tour or gone to other cities with them?
A. No.
Q. Does he have security staff who he employs for that purpose?
A. Yes.
Q. And that security staff is not in your -- under your jurisdiction; is that correct? 9508

A. No.
Q. Excuse me. All right. So when this foot patrol -- I'm saying "foot patrol," but the person around the house, you say foot patrol person around the house, what are some of the things that they check? You said there was some woman that got into the upper house. I assume that's something you try to prevent.
A. Yes. We check the doors. The house is secured at all times. Now the house is secured at all times. So we make sure that the doors and windows are closed. We also make sure that -- you know, if there's anything like a fire happening or some other hazard that's going on.
Q. And that sort of thing has happened in the past, has it not?
A. As far as fires?
Q. Fires.
A. Yes.
Q. So you check the door, like the back door and the front door, correct?
A. We check all the doors.
Q. Are there some doors around Mr. Jackson's private quarters?
A. Yes.
Q. What doors are there?
A. There's a patio door entrance.
Q. All right. So there's a patio right behind 9509

Mr. Jackson's private suite, correct?
A. Yes.
Q. And there's a door that locks in the wall around that private patio; is that right?
A. Yes.
Q. And why is it important to keep that secured?
A. To make sure -- well, we do open it occasionally for people to go in and clean. If we do find it unsecured, then we go as far as his back door and make sure that it's still secure, and we clear the area, and then close it afterwards, lock it.
Q. If some -- an intruder were to get in and they knew where they were going, and they were able to get through that door, that would be a pretty significant breach of security as far as Mr. Jackson's personal area is concerned; is that correct?
A. Yes.
Q. All right. Now, when we talk about the personal area, are you aware that there are locks on Mr. Jackson's door into his personal bedroom suite?
A. Yes.
Q. All right. There are guests who have -- let me withdraw that. If guests stay at the guest quarters that are just across the front driveway -- is that right? By the lake, correct? 9510

A. Yes.
Q. If guests stay there, where do they take their meals?
A. In the main house.
Q. So they would be expected to have the code to come into the main house, sit down at the breakfast table or the breakfast bar there?
A. Yes.
Q. Or the dining table, I suppose, for dinner, right?
A. Yes.
Q. Is that fairly routine? In other words, most of the guests that are staying overnight there have access to the main house?
A. Yes.
Q. Do most of the guests who are staying overnight there have access to Mr. Jackson's private quarters?
A. I wouldn't say most guests.
Q. So Mr. Jackson will decide who he's going to allow into his private quarters; is that right?
A. Yes.
Q. And on a given day, you might have staff people and visitors and a number of other people in that main part of the house; is that right?
A. Yes.
Q. Does Mr. Jackson want to maintain some privacy from that general group of people that might 9511

1 be there at any given time?
2 A. Yes.
3 Q. Now, there's also an arcade -- I'm sorry,
4 no, that's right, an arcade building.
5 A. Yes.
6 Q. We talked about the video library, but
7 there's a separate building that's the arcade
8 building, correct?
9 A. Yes.
10 Q. All right. And is that usually locked?
11 A. It's locked at a certain hour, I would say
12 about 2 a.m. when guests are on property, unless
13 it's been requested to leave it open all night.
14 Otherwise, it's open approximately about 8 a.m. in
15 the morning.
16 Q. All right. And a part of that building are
17 a couple of bathrooms, a men's room and a ladies'
18 room; is that correct?
19 A. Yes.
20 Q. And where is that in relation to the
21 swimming pool?
22 A. If you were facing the swimming pool, it
23 would be to the left.
24 Q. There's also a tennis court nearby there; is
25 that correct?
26 A. Yes, it's further left of that.
27 Q. So if people are using the tennis court or
28 the swimming pool, is that where they'd be likely to 9512

go if they were going to use the rest rooms?
A. Yes.
Q. And are those rest rooms, that rest room area, is that left unlocked during the time people are using the pool?
A. Yes.
Q. All right. Now, that leaves the supervisor, I think. What does the supervisor do?
A. The supervisor is there to supervise the officers. Make sure that -- we have daily duties that we do, such as checking our inventory or equipment, making sure that the basic part of our duties are being met. We have something that's a little more elevated than regular routine business there to manage that problem.
Q. I take it the supervisor also will keep an eye out for security issues throughout the ranch; is that right?
A. Yes.
Q. By the way, are any of the security guards armed?
A. No.
Q. Not with anything?
A. We do have pepper spray. But that's used only under very limited conditions. We've never pepper-sprayed anyone.
Q. That's pretty limited. So you've never used it? 9513

A. Never used it.
Q. And it's there for the case of an intruder,
for the most part; would that be correct?
A. Yes.
Q. So you don't carry firearms, stun guns,
anything like that?
A. Not during the time when I was chief.
Q. All right. You mentioned the gate logs.
And you're aware that there was a search on November
18th, 2003; is that correct?
A. Yes.
Q. Did you -- were you at the ranch when the
search occurred?
A. Not initially. But I did arrive afterwards.
Q. Was it your shift to be there?
A. I was not going to start my shift until noon
that day.
Q. So somebody called you, and you came more
quickly?
A. Routinely I would call in the morning to see
what activities happened overnight, if there was
anything I needed to be briefed on. So I'd usually
call around 8 a.m. to see what was new or what would
be expected for that day.
I was actually on the phone with Brian
Salce, who's a firefighter, just going over regular
things when he was describing to me what happened.
Q. All right. So what happened, you were 9514

hearing that a whole lot of sheriffs deputies and other people all of a sudden arrived at the ranch; is that correct?
A. Yes.
Q. So you came in?
A. Yes.
Q. At the time of the search, was there any effort made to conceal anything from law enforcement?
A. No.
MR. SNEDDON: Object; leading.
THE COURT: Sustained.
Q. BY MR. SANGER: All right. To your knowledge, were there any efforts made one way or another to prevent law enforcement from finding something?
A. No.
MR. SNEDDON: Same objection, Your Honor.
THE COURT: Sustained.
Q. BY MR. SANGER: All right. In any event, after the officers left, did you stay there till they left?
A. Yes.
Q. About what time of night did they leave?
A. Approximately 11 -- between 10:30 p.m. and 11 p.m.
Q. All right. Excuse me one second. I'll just ask. Can I have the gate logs? 9515

I don't remember the number. It's the book with the gate logs.
THE BAILIFF: Mr. Auchincloss has them.
MR. SANGER: There's a good reason why you can't find it. All right. Thank you.
Q. All right. We're talking about a gate -- or I'm going to talk about gate logs here in a second. So you told us about the gate logs being kept at the ranch, right?
A. Yes.
Q. When are the entries made in the gate logs?
A. The entries are made as people arrive. Their "in" time is documented or logged on the sheet; when they leave.
Q. So in other words, they're logs that are made contemporaneously with the event. Something happens, and it's written down; is that right?
A. Yes.
Q. It's not written down at the end of shift or the next day, for the most part?
A. No.
Q. Okay. When the officers search -- the team from the sheriff's department and the District Attorney's Office searched and they left, did you -- at some point thereafter, did you have occasion to determine whether or not they had located all of the gate logs?
A. I believe they had complete access -- they 9516

1 did have complete access to it. We had two
2 investigators and one deputy in that security office
3 for approximately two hours.
4 Q. Did they take the gate logs for 2003?
5 A. No.
6 Q. Where were they located?
7 A. They were located in the file cabinet.
8 Q. Right there in the security office?
9 A. Yes.
10 Q. All right. Did you later at some point
11 locate those records?
12 A. I located them that same evening.
13 Q. Later, in the middle of the night?
14 A. I was there for another day.
15 Q. All right. So you didn't go home that
16 night?
17 A. No.
18 Q. What did you do with the gate logs?
19 A. I left them in the file cabinet.
20 Q. At some point, did you take those gate logs
21 out and give them to somebody?
22 A. Yes.
23 Q. Who did you give them to?
24 A. Mark Geragos.
25 MR. SANGER: All right. I'm going to refer
26 to Exhibit 334 and 335, and I'd like to approach the
27 witness if I may, Your Honor.
28 THE COURT: You may. 9517

MR. SANGER: And I would -- there is some
Post-its on there. I don't know if they're -- okay.
May I inquire of counsel, Your Honor?
Did you put the Post-its on there, Mr.
Auchincloss?
MR. AUCHINCLOSS: One of them, yes.
MR. SANGER: Okay.
Q. All right. Well, just ignore the Post-its,
all right?
A. Okay.
Q. And take a look at Exhibit 334 and 335.
Just take your time and look through it.
So that's the pages from where your hand is
all the way to the end of the book, basically, okay.
You don't have to look at all the pages.
A. Okay.
Q. Somebody's already made an identification,
but I'm just going to ask you if those, in general,
appear to be the gate logs that you located in the
office after the search?
A. Yes.
Q. And those are the gate logs that you -- that
you gave to Mr. Geragos; is that correct?
A. Yes.
Q. At the time you gave them to Mr. Geragos,
you understood that Mr. Geragos was representing Mr.
Jackson --
A. Yes. 9518

Q. -- correct?
And those gate logs are logs that were kept on a contemporaneous basis? In other words, things were written in them when they happened?
A. Yes.
Q. Okay. Now, before we go to some of the details in there, let me ask you a couple more general questions.
Do the gate logs sometimes indicate instructions that are to be communicated to all of the security staff?
A. Yes.
Q. And what's the purpose of that?
A. So that we follow that directive for the day. Or if it's a directive that's given to us for a two-week period, then it's noted in the gate log and then carried over until it's no longer in effect.
MR. SANGER: All right. May I approach and retrieve the book?
THE COURT: Yes.
MR. SANGER: Thank you.
Q. All right. Let me go back to a subject that you had discussed earlier with regard to records that were kept. There are medical records; is that right?
A. Yes.
Q. And the medical records, are they part of 9519

the gate logs, or are they just --
A. No, they're separate.
Q. So it's a separate file folder that you keep these --
A. A separate binder.
Q. Or a binder? All right.
You mentioned that there was a -- if somebody was disciplined, for instance, for -- or let me withdraw that.
If somebody was involved in a golf cart accident, as an example, there would probably be a record of that made; is that right?
A. Yes.
MR. SANGER: And I'm going to put, if I may, Your Honor, 300 up on the -- on the board. Or on the screen.
THE COURT: All right.
Q. BY MR. SANGER: Now, the trick is to look at the board, and when you're ready to answer, turn around and speak into the microphone.
A. Yes.
Q. So, first of all, just for the record, I'm showing Exhibit 300, and it shows the tab at the bottom there. And this particular document, the testimony was it was seized by the officers. Do you know where that was seized from?
A. It was most likely in a binder that was located at the security office near the house. 9520

Q. Okay. Now, I'll ask you another question in a minute, so we'll leave that up there, with the Court's permission.
Was it the position of the staff, including the security staff, to reprimand guests, whether adults or children?
A. Yes.
Q. Okay. And when would that occur?
A. Whenever we felt their safety was in jeopardy.
Q. All right. If it's not a safety issue, or an issue of legality, for that matter, you know, something that involves security, was it your position to criticize guests?
A. No.
Q. Okay. What was the policy at Neverland as far as how you treated guests, whether adults or children?
A. We were very accommodating. Our emphasis is on hospitality and making sure that they feel welcome.
Q. Okay. And why was that?
A. That's what Mr. Jackson wanted.
Q. And as far as -- even though there are a lot of people involved, were you trying to make the atmosphere welcome to the guests, as if it was somebody's home?
A. That was our primary duty was to make them 9521

feel welcome.
Q. Okay. Now, if somebody was driving the golf cart and there was a safety issue, you now have this up on the board, and it appears that the driver in this case was Gavin Arvizo, is that correct, on Exhibit 300?
A. Yes.
Q. Okay. And this is something that happened June 21st of '02; is that correct?
A. Yes.
Q. All right. Now, according to this -- by the way, it says the reporting officer is G. Silva. That's not you?
A. No.
Q. As -- you were the chief at this time, though; is that correct?
A. Yes.
Q. And you were responsible ultimately for all of the reports and acts by your officers; is that correct?
A. Yes.
Q. Now, it indicates here, "Gave verbal warning to slow down or golf cart would be taken away." Would that be a policy?
A. Yes.
Q. And so what would you expect your officer to do at a time like that?
A. To take the cart away, if it was necessary. 9522

Q. So if it went on, actually take the cart away and say, “You can’t drive the cart”?
A. Yes.
Q. And did that happen from time to time with guests?
A. Yes.
MR. SANGER: All right. Now I’ll take this one down.
And give me just a second, please, Your Honor, because otherwise the book is going to be a mess.
All right. The book is going to be a mess anyway. I have to deal with it in a second.
Q. Okay. Now, did guests -- were guests cleared to do --
We can have the lights, if that’s all right.
I’ll come back to this in just a minute.
Were guests cleared to do certain things?
A. Yes.
Q. Were some guests not cleared to do certain things?
A. Yes.
Q. And there was a list which -- because the book is falling apart, I’m not going to turn to it right now, but there is a list when people are coming on the property that, at various times during the time you were there, guests would be cleared for certain activities and not others; is that right? 9523

A. Yes.
Q. And one of the activities was using the quadrunners; was that right?
A. Yes.
Q. If a guest was not behaving properly on the quadrunners or didn't show they were able to handle them, they might be excluded from using the quadrunners the next time?
A. Yes.
Q. That would show up in your records so that you would be able to refer to that; is that right?
A. If we were asked for a particular event, we would be able to.
Q. Now, did you always make things available to guests -- take your time. Have some water.
A. Excuse me.
Q. That's okay.
You also make equipment available to guests?
A. Yes.
Q. If they asked for it?
A. Well, if they were allowed to use it, yes.
Q. Okay. Were there occasions where you would not allow guests to use certain equipment?
A. Yes.
Q. And what technique would you use to advise guests that -- or convince guests that they might not use certain equipment?
A. Well, if they requested it and they were 9524

allowed to use it, of course we would make it available to them. If they requested it and they were not allowed to use it, then we would be very diplomatic about our reason for not allowing it to be used at that time.
Q. And how might you do that?
A. We might -- we just would say simply that the quads were not available for this weekend or for this day.
Q. Something like that. All right. So once again, you're trying to be courteous to the guests, right?
A. Yes.
Q. We'll come back to the gate logs in a little bit, but let me ask you some general questions. I'm going to take you back to the period from 1991 to 1993 when you worked there.
A. Okay.
Q. Did you have occasion to know the Robson family?
A. Yes.
Q. And can you describe the Robson family?
A. The family that I knew is a mother, daughter and son. Wonderful family. They seemed to be very close-knit. Both Chantal and Wade are bright, very articulate young people. And they're always very pleasant to be around. 9525

Q. Did you ever see anything inappropriate occur with regard to the Robson family?
A. No.
MR. SNEDDON: Object; vague.
THE COURT: Overruled. The answer is, “No.”
Next question.
Q. BY MR. SANGER: Did you know the Culkin family?
A. Yes.
Q. Can you describe that family?
A. Mother and father. I don’t quite remember how many kids they had. I think they had a few. Nice family.
Q. Okay. How about the Barnes family?
A. Yes.
Q. Tell us about them.
A. I met the mother, Karlee and Brett as well. I met the father once or twice. Wonderful family as well.
Q. And did they -- did these families spend time at the ranch while you were there?
A. Yes.
Q. Did they spend time as a family?
A. Yes.
Q. Did they engage in activities at the ranch?
A. Yes.
Q. Was Mr. Jackson always there when these families were there? 9526

A. Not always.
Q. Did you see Mr. Jackson interact with the families?
A. Yes.
Q. If Mr. Jackson was on the property, did he spend all of his time with these families when they visited?
A. No.
Q. What would Mr. Jackson do during this period of time besides spend time entertaining the guests?
A. I wouldn't know. I guess whatever Mr. Jackson does on his own time.
Q. Okay. Does Mr. Jackson have a studio on the ranch?
A. He has a dance studio.
Q. Does he spend time in the dance studio?
A. Yes.
Q. Is that someplace where he goes to work?
A. Yes.
Q. Does he spend sometimes hours in the dance studio?
A. Yes.
Q. Does he work in the dance studio till late night, late at night sometimes?
A. Yes.
Q. All right. Now, by the way, do you know the Chandler family?
A. Yes. 9527

Q. Can you tell me about the Chandler family?
A. Mother, young daughter at the time, I believe her name is Lily, and Jordie.
Q. Okay. And did you -- same questions I asked with regard to the other families. Did you see Mr. Jackson spend time with that family?
A. Yes.
Q. And sometimes he'd be on the property and wouldn't be with the family?
A. Yes.
Q. And sometimes he would not be on the property?
A. Yes.
Q. Now, for the most part, when children visited Neverland Ranch, did they visit the ranch with their parents?
A. Most of the time, yes.
Q. Now, we've heard about the large groups of kids that would come from either hospitals, or Make-A-Wish, or disadvantaged circumstances. That's a different situation, I take it; is that right?
A. Yes.
Q. And can you describe what would happen when those people would come to the ranch? I say "those people." When those groups would be invited to the ranch.
A. A typical day for them is they would arrive approximately between 10:30 a.m. and 11:00. They 9528

would be greeted by Neverland staff. Depending on the size of the group, they'd either be divided into two groups or kept in one group.
What they would see on the property is the zoo area, which they would arrive via small train that we have. They'd spend time there. They would have lunch approximately around noon, and either go to the theater or the amusement park. If we had two groups, one group would go to the arcade and do the same thing, but switch off so they weren't in the same places at the same time.
Eventually both groups would end up at the amusement park at the same time.
Q. Did those groups of kids tend to have a good time there, as far as you could tell?
A. Oh, yes.
Q. Okay. Is it part of the job that you enjoyed watching these kids?
A. Absolutely.
Q. Now, those groups of kids would be monitored or - what's the word? - chaperoned or supervised by people that generally came along with the group; is that correct?
A. Yes.
Q. And then staff people at Neverland would also assist?
A. Yes.
Q. With regard to the other children that came 9529

to the ranch, did the other children who came to the ranch generally come with their parents?
A. Yes.
Q. In other words, the guests, the ones that might stay overnight, came with their parents generally?
A. Yes.
Q. Okay. If parents were there to supervise, would it be appropriate for staff to override a parent's decision on something?
A. Yes.
Q. And would that be appropriate?
A. That would be appropriate, again, if their immediate safety was in jeopardy.
Q. So if kids were getting out of control, would you intercede?
A. I'm sorry, I didn't hear the last --
Q. If kids were getting out of control, would you intercede?
A. Yes.
Q. Did you have any knowledge of any child drinking alcohol or appearing to be under the influence at any time when you worked there from 1991 to the present?
A. No personal knowledge, no.
Q. And the alcohol on the ranch was -- where was that kept?
A. We -- I believe there is some alcohol 9530

located in the kitchen. Generally it's kept in the wine cellar.
Q. All right. And was the wine cellar generally locked?
A. Yes.
Q. Were children allowed to go into the wine cellar?
A. No.
Q. Where was the key kept for the wine cellar? And I'm going to ask you if it's moved from one time to another. Would you tell us about that?
A. Depending on the activity, there are two keys available. One in the main house and one in the security office.
Q. All right. And do you know where the key in the main house was kept?
A. Mostly behind the door as you enter the house staff's break room.
Q. So in the house, if you go through the back door, there is a little hallway that takes you to the left. That would take you to the kitchen and the family room, dining room, that sort of thing; is that correct?
A. Yes.
Q. And if you went through all of that, you'd keep going, you'd get to the library and to Mr. Jackson's private area; is that correct?
A. Yes. 9531

Q. If you come in the back door and enter that hallway, just to the right is where the maids' break room is; is that correct?
A. If you go through the back door, it's directly across. You go straight into the --
Q. So instead of going left down the hallway, you just go straight into that room?
A. Straight into it.
Q. All right. And is that a room that has couches and chairs and whatnot?
A. Yes.
Q. Comfortable room?
A. Yes.
Q. And that's used for the staff to take breaks, I take it?
A. Yes.
Q. And as you go across that hallway, just right inside the back door, the rack with the keys on it is just behind the door as you enter the break room; is that right?
A. Yes.
Q. And the break room is left unlocked for the most part; is that right?
A. As far as I know it is.
Q. Okay. Now, with regard to children visiting the ranch and activities - and let's talk about the guests who were staying overnight as opposed to the guests from the Make-A-Wish and that sort of thing - 9532

were both boys and girls included in the activities
at Neverland?
A. Yes.
Q. Was there any discrimination, to your
knowledge?
A. No.
Q. Did girls seem to have a good time?
A. Yes.
Q. Do you remember Marie Nicole?
A. Yes.
Q. And who's Marie Nicole?
A. Marie Nicole is the only daughter in the
Cascio family.
Q. Okay. And did she have the same run of the
ranch, as it were, as her brothers?
A. Yes.
Q. And you mentioned the families -- the Robson
family, the Barnes family. They both had daughters?
A. Yes.
Q. And the Culkin family also had daughters; is
that correct?
A. One daughter.
Q. Were those girls entitled to the same
privileges that their brothers were?
A. Yes.
Q. Did they engage in Super Soaker games from
time to time?
A. Yes. 9533

Q. Water balloon fights?
A. Yes.
Q. Did they go in the Jacuzzi?
A. Yes.
Q. The pool?
A. Yes.
Q. Play in the arcade?
A. Yes.
Q. Go in the house?
A. Yes.
Q. All right. Now, at some point, you met a person named Gavin Arvizo; is that correct?
A. Yes.
Q. Do you recall roughly when the first time was that Gavin Arvizo came to the ranch?
A. August of 2002.
Q. August of 2002?
A. August of 2000, excuse me.
Q. Okay. That's fine. And the -- did he come there with his family?
A. The first time I met him, I met him with his brother Star and his father David, I believe.
Q. Okay. Did you ever -- the first -- let me withdraw that.
Was Janet Arvizo there the first time you met Gavin?
A. I did not meet Mrs. Arvizo the first time.
Q. What do you recall about the first visit 9534

1 that the Arvizos had to the ranch?
2 A. Well, Gavin was quite sick at the time.
3 What I most remember is the dad being present and
4 taking care of him with his brother.
5 Q. Okay. Were there other visits between 2000
6 and 2003? In other words, before February of 2003,
7 were there other visits that the Arvizo family made
8 to the ranch?
9 A. Yes.
10 Q. And during those visits, was Mr. Jackson
11 always present at the ranch?
12 A. No.
13 Q. Who did they tend to come with when Mr.
14 Jackson was not present?
15 A. Chris Tucker.
16 Q. Was the father always present?
17 A. No. After they came, I believe, after Gavin
18 was sick, he seemed to recover, and I don't remember
19 the father coming after that.
20 Q. Okay. So while Gavin was sick, his father
21 was there; is that correct?
22 A. Yes.
23 Q. And while the father was there, how did the
24 boys behave?
25 A. There were very well behaved.
26 Q. When the father stopped coming, how did the
27 boys behave?
28 A. They increasingly became a little more 9535

rambunctious.
Q. All right. Now, you said that Gavin seemed to be ill and was eventually recovering, and he got to a point where he seemed to have recovered?
A. Yes.
Q. Okay. While he was visibly ill, how did Mr. Jackson interact with him?
A. I think he was very gentle with him, very caring, just what I remember at the time.
Q. Did he seem to be concerned about him, his well-being?
A. Yes.
MR. SNEDDON: I'm going to object. Calls for speculation.
THE COURT: It's leading. Sustained.
Q. BY MR. SANGER: All right. Now, let's talk about up to the point just before February 2003. Do you recall the last time that this family or any members of this family visited the ranch?
A. I believe it was in the summer of 2002.
Q. And how were the Arvizo boys behaving during that time, in the summer of 2002?
A. They were quite active during that time period.
Q. And when you say "quite active," what did they do?
A. I would say they were enjoying all the privileges of the ranch. I wouldn't say they were 9536

nonstop, but they were pretty active.
Q. Okay. And did they have some problems that seemed to need some attention?
A. Yes.
Q. Can you describe what that was?
A. Well, we just had a viewing of a golf cart accident, so that would be one example.
Q. Okay. Do you recall the family coming to the ranch in February of 2003?
A. Yes.
Q. And what happened in February 2003? Let me withdraw that.
Let's start with this: What were the Arvizo children doing in February of 2003?
A. They were there for an extended amount of time. I don't know exactly what they were there for.
Q. Okay. Did they tend to be in the presence of the security people?
A. Yes.
Q. Describe that.
A. Well, they were there for quite a while, off and on, throughout the weeks. We had contact with them because of their behavior, their activity. That's pretty -- it was pretty limited to that.
Q. What did they -- what kind of behavior are you talking about?
A. You know, again, they were active. I guess 9537

I'm trying to be polite here. They were very active.
Q. Well, you have to be -- it's nice that you're being polite, but we have to ask you to just tell it like it is, whatever it is.
A. They were pretty reckless at the time. They were driving very fast in the golf carts. They were also driving ranch vehicles. They'd get in a ranch vehicle, and take off and drive, and we'd have to stop them. You know, they were young. They couldn't drive a regular vehicle.
Q. Well, let me stop you at that for a moment. When you say "ranch vehicles," what kind of vehicles did you have to stop them in?
A. A regular van, like an Astro van. Mr. Jackson's personal vehicle, a Navigator at the time. Other things, like -- they were pretty destructive, I would say.
Q. So let's talk about the vehicles first. At the ranch, are the keys usually left in the vehicles during the day?
A. Yes.
Q. Are they left in the vehicles during the night?
A. Yes.
Q. In fact, in the garage -- there are some vehicles that are parked in the garage, correct?
A. Yes. 9538

Q. And the keys for those vehicles are sitting right up on the dashboard right there in view?
A. Depending on what is in the garage at the time, I would say yes.
Q. Okay. So when the Arvizo kids got the -- say, the Astro van, an Astro is like a regular mini-van, right?
A. Yes.
Q. When they got in, say, the Astro van and started driving it, to your knowledge, did they ask anybody for permission?
A. No.
Q. And where would they drive it?
A. They would drive it on the property.
Q. Okay. Do you know if they ever drove out through the gates, the golden gates I guess you call them?
A. Well, they did drive it around. How far they went -- they never drove off the property, but they drove on the property.
Q. Okay. Did they drive golf carts through the golden gates?
A. Yes.
Q. So they would be out in that area between the -- I still don't have the word for it, but whatever it is, the private --
A. Occupied area of the property.
Q. There you go. Occupied area. They'd be out 9539

in the area that is more or less ranch land; is that correct?
A. Right.
Q. All right. Were they neat and tidy?
A. Not always.
Q. What would you tell us about that?
MR. SNEDDON: I'm going to object, unless there's some foundation as to personal knowledge as to this.
THE COURT: Sustained.
Q. BY MR. SANGER: To your knowledge, did you see whether or not they were neat and tidy?
MR. SNEDDON: Same objection.
THE COURT: Sustained. "To your knowledge" still encompasses beyond her personal knowledge.
MR. SANGER: "Did you see" is what I asked.
Okay. Let me withdraw the first part.
Q. Did you see any behavior with regard to whether or not they were neat and tidy?
A. Yes.
Q. Okay. What did you see?
A. I saw them wearing the same clothes for a few days.
Q. How about taking care of policing their area or picking up after themselves? Did they do that?
A. Well, they littered quite a bit. So -- the personal area I didn't have access to.
Q. All right. Now, from February to March of 9540

2003, did you see Janet Arvizo from time to time?
A. No.
Q. Did you ever see her?
A. Rarely.
Q. Okay. So let's talk about the rare times when you saw her, okay? Can you describe her demeanor during the rare times you saw her from February through March?
A. I would say she was from either excited or not excited. She was never just -- I don't want to say "normal," but she was either very happy or she wasn't speaking.
Q. All right. Was that unusual to you?
A. I don't know. I didn't know Mrs. Arvizo, so I don't know what her demeanor -- her regular demeanor was.
Q. I guess what I'm saying, are you describing somebody that we'd all -- never mind. Let's put it this way: Are you describing what you might call normal behavior or did this seem to be more extreme?
MR. SNEDDON: Your Honor, I'm going to object as lack of foundation.
THE COURT: Sustained.
Q. BY MR. SANGER: All right. So she'd either be happy or she would be very quiet?
A. Very quiet.
MR. SNEDDON: I'm going to object. Asked and answered. 9541

MR. SANGER: It's leading into the next question.
MR. SNEDDON: Well, that doesn't make it --
THE COURT: The answer was, "Very quiet."
Next question.
Q. BY MR. SANGER: Where would she go when she was on the ranch during that period of time, February and March?
MR. SNEDDON: Object; lack of foundation.
THE COURT: Sustained.
Q. BY MR. SANGER: Did you see where she went?
A. I saw that she -- I know she was assigned a guest unit.
Q. And did you see her at -- now, you would not be in the house; is that right?
A. No.
Q. Did you see her around other parts of the property from time to time?
A. Very rarely.
Q. Who was taking care of the boys, Gavin and Star?
MR. SNEDDON: Object. Calls for a conclusion; lack of foundation.
MR. SANGER: Okay. Let me withdraw it, just to make this clear.
Q. I'm going to ask you about what you observed yourself, okay? So the first question is, based on your observations, who was taking care of the boys? 9542

MR. SNEDDON: I still object. There's been no foundation that she ever saw anything, and it calls for a conclusion.
THE COURT: Sustained.
Q. BY MR. SANGER: Did you see the boys, Star and Gavin, during this period of time, February to March of 2003?
A. Yes.
Q. Did you see Davellin?
A. Yes.
Q. Did you have an opportunity to determine who was taking care of the boys?
A. I would say Davellin was taking care of them.
Q. Did you see Janet Arvizo interact with her boys at all during that period of time?
A. No.
Q. What would Davellin do to take care of the boys?
A. If they needed correcting or if they were being -- if they were saying something that was inappropriate, she would ask them to stop talking about that, or she'd remind them to go take a shower, or something like that.
Q. And what was Davellin doing on the ranch during this period of time?
A. She was doing what the boys were doing. Watching movies. Driving around in golf carts. 9543

Q. Did she seem to be having a good time?
A. Yes.
Q. Did any of the Arvizo kids spend time, to your knowledge, to your observation, with the security staff?
A. Yes.
Q. What did they do?
A. They would come and visit us from time to time in the office and sit in our -- sit in our office.
Q. And would they talk to you?
A. Yes.
Q. What would they talk about?
A. Oh, just regular things. You know, what we were doing, and, you know, what was going on, that type of thing.
Q. Did they ever complain to you about anything?
A. No.
Q. Now, you said you saw Janet Arvizo from time to time. Did she ever complain to you about anything?
A. No.
Q. During the February to March 2003 period, did the Arvizos leave the ranch from time to time?
A. Yes.
Q. Who took them off the ranch?
A. I would say it was limited to either Vinnie 9544

Amen or Chris Carter. Occasionally Mr. Marcus, Joe Marcus, would take them off property.
Q. Okay. And what were the purposes of going off the property?
A. I'm not sure. I didn't inquire. Once they were there at the gate and they were ready to leave, we would just open the gate and let them leave.
Q. Were there times they went off the property, for instance, during the day, and they came back three or four hours later?
A. Yes.
Q. And when they went through the gate, did they check in and out just like any other guests?
A. Most of the time. I mean, sometimes if we have a guest that's, you know, coming on and off the property, we wave them through, make sure we get a head count to see who's leaving so we can account for them later.
Q. So when people would go off for a trip to town, for instance, you would not necessarily always write that down; is that correct?
A. No, we would write it down. I mean, someone will slip through. You don't always see someone. Maybe they're sitting down in the seat. And we try not to hold anyone up at the gate if they're leaving.
Q. All right. Did you -- do you know Ronald Konitzer and Dieter Weizner? 9545

A. Yes.
Q. And were they at the ranch in February and March of 2003?
A. Yes.
Q. Were they there every single day?
A. No.
Q. Was Ronald Konitzer there with anybody?
A. He was there with his wife and his son.
Q. And did you have an opportunity to observe Mr. Konitzer and his wife and his son?
A. Yes.
Q. Can you describe their demeanor?
MR. SNEDDON: Object as irrelevant, Your Honor.
THE COURT: Overruled.
THE WITNESS: They seemed to interact like a regular family.
Q. BY MR. SANGER: Were they impolite, or polite, or --
A. No, they were very polite.
Q. Did you see -- when you saw Dieter Weizner there, what did you see him doing?
A. He was there on the property. Exactly what his function was, I don't know.
Q. All right. Did you see either Ronald Konitzer or Dieter Weizner ever treat any of the Arvizos in an unusual or inappropriate fashion?
A. No.

MR. SNEDDON: Object; lack of foundation.
THE COURT: Sustained.
Q. BY MR. SANGER: Did you ever see any of the Arvizos in the presence of Mr. Konitzer and Mr. Weizner?
A. I can't recall a specific time, but they were there on the property at the same time.
Q. They were there together with --
MR. SNEDDON: Move to strike as nonresponsive.
THE COURT: I'll strike the last phrase, they were on the property.
Q. BY MR. SANGER: Okay. Well, during February and March 2003, were Konitzer and Weizner on the property at the same time as the Arvizos?
A. Yes.
Q. Did you see any interaction between them?
A. No.
Q. By the way, who is Miko Brando?
A. Miko Brando is the son of Marlon Brando.
Q. And was he a guest or an employee, to your knowledge?
A. He's been both. But on this occasion, again, I don't know what he was doing. I know that he was there off and on.
Q. Did you ever see Janet Arvizo leave the premises with Katie Bernard?
A. Yes. 9547

Q. Who is Katie Bernard?
A. Katie Bernard was the secretary at the time.
Q. All right. So she's an employee of the ranch, correct?
A. Yes.
Q. And what kind of a vehicle did they leave in; do you know?
A. I don't recall right at this moment. It probably was a ranch vehicle.
Q. All right. And do you recall roughly when this occurred?
A. It was during the time they were there. I believe during the initial part of their visit.
Q. Okay. Initial part of February? I couldn't hear you.
A. The initial part of their visit, yes.
Q. Would that be the first part of February?
A. Yes.
Q. And do you recall Katie Bernard -- let me withdraw that.
Do you recall the purpose of Janet Arvizo leaving with Katie Bernard?
A. I believe she had a salon visit.
Q. Okay. Was there any film crew following them as they left the ranch?
A. No. I -- actually, I don't know.
Q. Okay.
A. Not that -- I was not told that. 9548

Q. All right. You didn't see any film crew there to follow them when they left the ranch?
A. No.
Q. All right. Was there anything that would have prevented any guest at the ranch, including Janet Arvizo, from calling 9-1-1 if they had some sort of emergency?
A. No.
Q. And how do you call 9-1-1 from the ranch?
A. From the guest units, you immediately receive an outside line, so you could pick up the phone and dial 9-1-1.
Q. So the guest units, you don't even have to use the code?
A. No. I haven't done it for a long time, but from what I believe, you can just pick up the phone and you get an outside line.
Q. On some of the other phones, you have to dial a code to get an outside line?
A. Correct.
Q. And that would be true for any kind of a call; is that correct?
A. Correct. We have a -- an emergency procedure, something that would be similar in a hotel room, that shows you how to get out if there's an emergency. It's near the phone. It gives you directions on what to do in the event of an emergency. It would be either to call extension -- 9549

the extension at the gate and report whatever the problem was.
Again, I'm not very clear if you can just pick up the phone. I'm almost certain you can; that you can pick up the phone and dial out and get an outside line.
Q. So let's put it this way: The phones in the guest units may or may not require a code to get an outside line?
A. Correct.
Q. But if you can make a phone call from the guest units one way or the other to Los Angeles, for instance, you can call 9-1-1, correct?
A. Yes.
MR. SNEDDON: Your Honor, I'm going to object to the form of the question in the sense that she says she doesn't know whether there's a code to get out or not.
THE COURT: Sustained.
Q. BY MR. SANGER: All right. If there's no code, you would just dial 9-1-1, and you get emergency dispatch, right?
A. Yes.
MR. SNEDDON: Object. Calls for speculation. She doesn't know.
THE COURT: Overruled.
Q. BY MR. SANGER: And if the phones in the guest room had the same code as other phones on the 9550

ranch, you would dial the outside code and then 9-1-1; is that right?
A. Yes.
Q. All right. And my question is, whichever way it worked, if you could make calls to Los Angeles, for instance, from the phone in the guest ranch, you would also be able to call 9-1-1, correct?
A. Yes.
Q. So if somebody knows the code to call an ordinary number, that's the same code you'd use to get an outside line if you needed it, right?
A. Yes.
Q. Was there an occasion when Janet Arvizo was supposed to leave the ranch and did not want to go or did not show up?
A. I recall a time that the kids left before her, and she left maybe an hour, hour and a half after them. I don't recall the date, but I remember, leaving, it seemed a little inefficient to me, since they were all leaving, that she wasn't ready or -- I don't know the reason for her delay, but she didn't leave the same time they did.
Q. What kind of vehicle was there waiting for her?
A. I don't recall the vehicle exactly.
Q. All right. Some sort of vehicle that was being chauffeured by someone? 9551

A. It could have been a ranch vehicle.
Q. But it was being driven by somebody?
A. Yes.
Q. Okay. So somebody had the vehicle there and the kids were ready, but Janet wasn't?
A. Right.
Q. All right. Let me ask you about the kids, that is, the Arvizo children, being allowed to leave the ranch. Were they allowed to leave the ranch anytime they wanted to?
A. They were allowed to leave the ranch, but they were supervised.
Q. All right. Was there a concern about them not being supervised?
A. Well, their mother wasn't there on some occasions, so I would say yes.
Q. All right. And when their mother wasn't there, were they allowed to leave the ranch if they didn't have an adult with them?
A. Yes.
Q. Okay. Let me ask that again. Maybe you meant to say that. But if they didn't have an adult --
A. If they didn't have an adult, they were not allowed to leave.
Q. If there was not an adult?
A. They needed to be supervised.
Q. Do you recall if that was communicated to 9552

the security staff at any time?
A. Yes.
Q. And how was it communicated?
A. It was directed to me verbally, and it was also a written directive.
Q. And who told you that?
A. I came in on my shift, and I believe one of my supervisors advised me of the directive and that's how I was notified.
Q. Did the -- did the children -- you talked to the children from time to time, right?
A. Yes.
Q. Did they ever say they wanted to leave --
MR. SNEDDON: Object. Calls for hearsay.
THE COURT: Overruled.
MR. SANGER: I actually didn't finish the question, but let's just leave it at that.
Q. Did they ever -- did the Arvizo children ever say in your presence that they wanted to leave the ranch?
A. No.
Q. To your knowledge, were they ever prevented from leaving the ranch when they requested it?
A. No.
MR. SANGER: Now, Your Honor, what I'd like to do is put up Exhibit 334. And this is the one that has multiple pages, so I'm going to refer to MJ00154 as the particular page from Exhibit 334. 9553

May I publish that?
THE COURT: Yes.
MR. SANGER: Thank you.
Q. All right. That's not focusing really well.
Can you read it?
A. It --
Q. I'm going to --
A. The 19th of February?
Q. Yes. February 19. And I'm going to refer to this line right here. Can you read that line? If you can't, I'll bring it up to you so you can read it.
A. Yes, I can read it.
Q. What does that line say, first of all?
A. "The kids are not allowed to leave per Joe. 'Kids' meaning like Gavin, Star, et cetera."
Q. Who wrote that there; do you know?
A. I believe that was Officer Elenes.
Q. So there was -- that was an officer who was doing that at whose direction; do you know?
A. Per Joe Marcus.
Q. And there's a number, "1752." So that would be 5:52 in the afternoon?
A. Yes.
Q. Do you know if the kids, in fact, left the ranch that same night?
A. I'm not sure what time they left.
Q. All right. If you look at the gate logs, 9554

you could figure that out. We won't have you do it.
They've already been introduced.
A. Yes.
Q. So you could tell from the gate logs
presumably when they left?
A. Yes. I'm sorry.
MR. SANGER: All right. All right. We can
turn the lights back on.
Is that your Post-it?
MR. AUCHINCLOSS: Yes.
MR. SANGER: That's yours?
Q. And the contacts that you had with Janet
Arvizo, did she ever indicate to you that she wanted
to leave?
A. No.
Q. And if she indicated she wanted to leave,
would she have been allowed to leave?
A. Yes.
Q. Were you aware as to whether or not
transportation was arranged for -- you mentioned one
time. Other than that one time, was transportation
arranged for her to leave the ranch from time to
time?
A. Yes.
MR. SANGER: All right. May I have just one
moment, Your Honor?
THE COURT: Yes.
Q. BY MR. SANGER: Okay. While the Arvizos 9555

were there at the ranch from February to March 2003, did you see them have contact with other guests?
A. Yes.
Q. And in particular, Davellin. Did Davellin have contact with other guests?
A. Yes.
Q. Who do you recall, if anyone in particular?
A. Marie Nicole. Whatever -- whatever other guests were there as well. We had quite a few guests during that time period. I can't recall exactly who was there, but whoever was there, she was involved with them.
Q. Did she spend a lot of time with Marie Nicole?
A. I believe so. They were two girls, and so they did spend some time together.
Q. And did Davellin also spend time with one of the firefighters, firemen, or whatever you call them there? I'm sorry.
MR. SNEDDON: Object; lack of foundation.
Q. BY MR. SANGER: To your knowledge.
THE COURT: Just a moment.
MR. SANGER: Let me withdraw it. I'll say some other words and make it better.
THE COURT: Okay.
Q. BY MR. SANGER: You said you saw the kids spending time in the security office from time to time? 9556

A. Yes.
Q. Was there anybody in particular, either security or fire person, who Davellin -- who you saw Davellin spend time with?
A. During that time period, or --
Q. February to March of 2003.
A. Not anyone particular. I mean, she was there, but I can't remember anyone specifically.
Q. All right. So she spent time with more than one person?
A. Well, we're a staff, and we're active just as well. So I'm sure in passing, you know, there was a greeting. "Hello, how are you?" that type of thing, or she would come in and ask for something, so --
Q. All right. Now, what about the boys? Who would they spend time with, Star and Gavin?
A. They would mostly spend time with each other or alone, you know, so -- I believe Mr. Brando's son was there during that time period. So one of the Cascio -- the younger Cascio boys was there as well.
Q. Did they spend time with the Cascio boys, or one of the boys?
A. Yes.
Q. Did they spend time with one of the Brando kids? This must be a grandchild.
A. Yes.
Q. A grandchild of Marlon Brando? 9557

A. Shane.
Q. Shane. Did they spend time together?
A. Yes.
MR. SANGER: Okay. Very good. I have no further questions.
THE COURT: Cross-examine?

CROSS-EXAMINATION
BY MR. SNEDDON:
Q. Good morning.
A. Good morning.
Q. During the time that you were at the ranch, you had a progression of responsibilities that got larger and larger, correct?
A. Yes.
Q. So you worked there continuously from ‘91?
A. Yes.
Q. Until current? You’re a current employee?
A. Yes.
Q. And you worked your way up to head of security at one point in time, correct?
A. Yes.
Q. And now you’re -- you’ve been -- I don’t want to use the wrong term, but you are no longer head of security?
A. No.
Q. And there’s somebody else who’s head of security out there, correct? 9558

A. Yes.
Q. Now, during this period of time, you met a lot of families that visited the ranch, I would assume, correct?
A. Yes.
Q. And you've mentioned the Robeson family, the Robson family --
A. Yes.
Q. -- as one of the families.
The Culkin family?
A. Yes.
Q. The Barnes family?
A. Yes.
Q. And the Chandler family?
A. Yes.
Q. The Cascio family?
A. Yes.
Q. Okay. And the Arvizo family are just a few of the ones that visited the ranch, correct?
A. Yes.
Q. With respect to the Robeson -- or Robson family, I'm sorry, after the first visit of that family to the ranch, the father was never there anymore, was he?
A. I never met the father.
Q. And with regard to the Barnes family, after the Barnes family visited for the very first time, the father was never there at the ranch when they 9559

visited, were they -- was he?
A. The father returned and made visits.
Q. How many occasions do you recall Mr. Barnes being on the property?
A. From one visit to another? Do you mean separate incidents --
Q. Yes, ma'am.
A. -- or days?
I would say at least two or three times afterwards.
Q. Now, there were times that Brett Barnes, the young child, that he was at the ranch alone, correct, without any of his parents?
A. There could have been a time, yes.
Q. There could have been more than one time, couldn't there?
MR. SANGER: Objection; calls for speculation.
THE COURT: Sustained.
Q. BY MR. SNEDDON: Do you recall there was more than one occasion when Brett Barnes was on the ranch without any parents being present?
A. Yes.
Q. In fact, he would stay several days at a time on the ranch, correct?
A. I wouldn't -- I don't remember the exact number of days, but I do remember him being there.
Q. And when he stayed at the ranch, he stayed 9560

in Mr. Jackson's bedroom, correct, when his mother was not at the ranch?
A. I don't know exactly where he stayed. But he would stay in the main house.
Q. So to your knowledge, he was in the main house, but you don't know where in the main house?
A. Correct.
Q. And when Mr. Robson -- not "Mr.," the child Robson visited the ranch, he was there on occasion without his mother or his father, correct?
A. I don't remember exactly that, but there could have been.
Q. When he did, he stayed in the main residence also, correct?
A. Yes.
MR. SANGER: I'm going to object to the question of "When he did" as assuming facts not in evidence.
MR. SNEDDON: Well --
MR. SANGER: Or vague.
THE COURT: Overruled. The answer was, "Yes."
Q. BY MR. SNEDDON: And you say, with regard to both Brett Barnes and to Wade Robson, that you just know they're in the house, because the staff was not allowed into the house, correct, the security staff, except if there was an emergency or at Mr. Jackson's request? 9561

A. Yes.
Q. And you recall the Chandler family, correct?
A. Yes.
Q. Did you ever recall meeting Mr. Chandler?
A. No.
Q. Or a Mr. Chandler at all?
A. No.
Q. Or a husband at all?
A. No.
Q. And the child's name was Jordan Chandler, correct?
A. Yes.
Q. You know who I'm talking about when I talk about Jordan Chandler?
A. Yes.
Q. And Jordan Chandler visited the ranch on a number of occasions without his mother, correct?
A. Again, my recollection is he may have. I'm not sure.
Q. And when he did, he stayed in the main house?
A. Yes.
Q. And again, you don't know where he stayed in the main house?
A. No.
Q. And Macaulay Culkin visited the ranch without his parents, correct?
A. I remember him mostly being with his 9562

parents, unless he was an adult. He's been there recently without his parents.
Q. Well, I don't mean -- you're right. I should go back.
Between the period of 1991 and 1993, Macaulay Culkin visited the ranch without his parents being present, is that correct, on occasion?
A. My recollection is that he was there with his parents.
Q. Is it your recollection also that he stayed in the house?
A. Yes.
Q. Now, you mentioned one of the families that you saw a good deal of is the Cascio family, correct?
A. Yes.
Q. And one of the people who you observed over the years was Frank Cascio, correct?
A. Yes.
Q. And you know him as Cascio, right?
A. Yes.
Q. And when you first met Mr. Cascio, he was just a young boy, wasn't he?
A. Yes.
Q. In other words, he was about 11 or 12 years old?
A. I'm not sure of his age.
Q. Would he -- would he be about the same age 9563

as the other boys who were visiting around that time, Brett Barnes, Wade, Jordan?
A. Most likely, yes.
Q. And he also would spend time with Mr. Jackson in Mr. Jackson's house, correct?
A. Yes.
Q. And the difference is that in this case Frank Cascio used to visit with Mr. Jackson a lot, correct, kept an ongoing relationship with Mr. Jackson?
A. The family kept an ongoing relationship.
Q. Okay. That's fair enough. So it was the whole family, as well as Frank Cascio, that kept a relationship with the defendant?
A. Yes.
Q. And you would describe, would you not, that this family is very close to Mr. Jackson?
A. Yes.
Q. Based on your observations?
A. Yes.
Q. And you would -- I believe you said that in the year 2000, you knew that Mr. -- Frank Cascio went to work for Mr. Jackson, correct?
A. I have not said that here.
Q. No. I'm asking. You said that to an investigator, correct?
A. Yes, possibly.
MR. SANGER: Objection; calls for hearsay. 9564

THE COURT: Sustained.
Q. BY MR. SNEDDON: Did you not tell somebody that you believed he went to work for Mr. Jackson in the year 2000?
A. Yes.
MR. SANGER: Objection. Excuse me. Calls for hearsay.
THE COURT: Sustained.
MR. SANGER: Move to strike.
THE COURT: Stricken.
Q. BY MR. SNEDDON: Where did you get the knowledge that Mr. Cascio went to work for Mr. Jackson in the year 2000?
MR. SANGER: Objection. Calls for -- facts not in evidence. The Court sustained its --
THE COURT: Sustained.
MR. SANGER: Thank you.
Q. BY MR. SNEDDON: Were you at any time aware of the fact that Mr. Cascio worked for Mr. Jackson?
A. I was aware that he was working on projects on the property for Mr. Jackson.
Q. During the time frame from 2000 to 2003, would that be the time period that you had reference to?
A. Yes.
Q. And would you describe the relationship between Mr. Jackson and Frank Cascio during this period of time from 2000 to 2003, that it continued 9565

to be a very close relationship, correct?
A. Yes.
Q. A trusted friend, correct?
A. I believe so.
Q. Now, with regard to Mr. Frank Cascio, were you aware of the fact that he changed his name or was using another name?
A. Yes.
Q. And that was during the time period of February and March of 2003, correct?
A. I believe so.
Q. And he used the name Frank Tyson, correct?
A. Yes.
Q. Was that the first time you ever heard him use the last name of Tyson during that period, February and March?
A. I don't know if it was during that time period, but I could safely say probably yes.
Q. It was during the time when the Arvizo family was at the ranch, correct?
A. I believe it was during that time period.
Q. And in fact, during 2002, Mr. Tyson had visited the ranch on a number of occasions, correct?
A. In 2002?
Q. Yes, ma'am.
A. How many times I don't know, but he -- most likely he did.
Q. When he visited, he would have been noted in 9566

1 the logs, the ranch logs that you referenced?
2 A. Yes.
3 Q. And on each occasion he's referenced as
4 "Cascio," is he not?
5 A. Yes.
6 Q. Did you ever see Mr. Jackson having meetings
7 with Frank Cascio during February and March of 2003?
8 A. I'm sure they met. I don't know what -- if
9 it was an actual meeting or what it consisted of,
10 but they spoke with each other.
11 Q. They had a lot of conversations between the
12 two of them, did they not, regularly? Or conversed
13 regularly, how about that?
14 A. Well, they're friends, so I imagine they
15 would have a lot to talk about.
16 Q. And Dieter Weizner, did you see him having
17 conversations with the defendant during February of
18 2003?
19 A. No.
20 Q. Never?
21 A. Never.
22 Q. You never saw them in Mr. Jackson's office
23 meeting?
24 A. I did not see that.
25 Q. But if they were meeting in the house, you
26 wouldn't have known that either, would you?
27 A. No.
28 Q. With regard to Mr. Konitzer, did you ever 9567

see Mr. Jackson meeting with Mr. Konitzer?
A. No.
Q. Now, you mentioned Miko Brando. And he has
a son named Shane, correct?
A. Yes.
Q. And it's correct, is it not, that actually
during February of 2003, Shane Brando got in an
accident with one of the carts and actually injured
Gavin, did he not?
A. Yes. They both crashed into each other.
Q. But the log reflects the fact that it was
Shane Brando who was at fault; isn't that correct?
A. Yes.
Q. Now, how old is Shane Brando in 2003? About
the same age as Gavin?
A. I'm not sure how old Shane is. He's a big
kid, so I don't know exact -- his exact age.
Actually, he's -- he's probably about 16 now, so....
Q. So he would have been about 14 or 13 then?
A. Sure.
Q. You've talked a lot about the procedures for
the security on the ranch. And I wanted to ask you,
first of all, you've said that there is a procedure
now where people work 12 -- 12/12, two shifts,
right?
A. Yes.
Q. That wasn't always the case, was it?
A. No. 9568

Q. Back in 1991, ‘92, ‘93, there was a graveyard shift, correct?
A. Yes.
Q. And that shift started at ten o’clock at night and worked through the morning hours, correct?
A. During different times, we would -- when I initially started working, the shift started at midnight till 8:00 in the morning. I don’t know what year we changed that where the shift would start at 10 p.m. and work till 6 a.m.
Q. But there was a shift that worked from 10:00?
A. Yes.
Q. Called the graveyard shift, correct?
A. Yes.
Q. Now, just a couple of questions about the logs that you’ve described. I think you said earlier in your direct examination with Mr. Sanger that the logs, the gate logs, went to the administrative office up on the hill, correct?
A. Yes.
Q. And how did they find their way down to the security office?
A. The gate logs are used to verify the payroll. Payroll is done on Monday mornings. So if someone forgets to punch in or punch out, then they refer back to the gate logs to see what time that employee left, if it was needed. 9569

Once they're -- once they're through with them, then they're filed back into the office and they're kept in that file for a year, until the end of the year, when they're filed in another box and stored.
Q. By "the office," do you mean taken physically from the administrative office down to the security office?
A. Yes.
Q. Would you tell me how many drawers are there in the cabinet that you say you retrieved these logs from?
A. There's four.
Q. And which of the drawers was it that you retrieved them from?
A. They were in the second drawer.
Q. Second from the top or the bottom?
A. Second to the top. Second to the top.
Q. Now, the keys to the house, you say they're kept in the break room, correct?
MR. SANGER: Objection. That misstates the evidence, "The keys to the house."
THE COURT: Overruled.
You may answer.
THE WITNESS: The keys to the house?
Q. BY MR. SNEDDON: Well, keys to the arcade. I'm sorry if I said the wrong building. I'll take that back. The wine cellar. The keys to the wine 9570

cellar are kept in the break room?
A. Yes, they are kept in the break room. Yes, they are kept in the break room.
Q. The break room has a safe, correct?
A. Yes.
Q. At any time during the time you worked there, have those keys ever been locked in that safe?
A. Yes.
Q. And during the time that you've worked there, has it been the habit and custom of the people working on the property that the housekeepers, during the daytime, keep the key on their person during the entire day?
A. Yes.
Q. In fact, you had to go retrieve the key from the housekeeper the day of the search warrant to let the officers in, correct?
A. Some of the keys I did not have access to during that time period, so it was not available to me. I would have to ask them for the key.
Q. So the answer is --
A. Yes.
Q. -- on the day of the search warrant, you had to go to one of the housekeepers to get the key to allow the officers to get in the arcade and the wine cellar, correct?
A. For immediacy purposes, yes. 9571

Q. Now, in 2003, I'm assuming that if you were the head of security at that time, if you had any problems, staffing problems, they would have been things that you discussed with Mr. Marcus, correct?
A. Yes.
Q. And do you recall having a conversation with Mr. Marcus where you discussed the fact that you were very short of staff and it was becoming a security issue on the ranch?
A. Yes.
MR. SANGER: Objection; calls for hearsay.
THE COURT: Sustained.
MR. SANGER: Move to strike.
MR. SNEDDON: All I asked was if she had a conversation. I didn't ask what was said, Your Honor.
THE COURT: You kind of filled that in, though.
Q. BY MR. SNEDDON: Did you have a conversation with Mr. Marcus about security issues of concern to you?
A. Yes.
Q. Now, let me ask a few other questions about procedures at the ranch. For instance, the groundskeepers, they're day staff only?
A. Yes.
Q. So what time would they ordinarily leave?
A. Their working hours are from 7 a.m. to 3:30 9572

1 p.m.
2 Q. And the maintenance people, same hours,
3 basically?
4 A. Yes.
5 Q. So they would go home at 3:30?
6 A. Yes.
7 Q. And the zoo people?
8 A. Same time.
9 Q. And most of the maid staff would go home at
10 the same time, except those that were kept for the
11 night?
12 A. Yes.
13 Q. And those that were kept for the night would
14 come in at a little later time, correct?
15 A. Yes, I believe so.
16 Q. So basically, other than a few staff --
17 well, let me ask you this: The housekeeping staff
18 that was retained at night was smaller in numbers
19 than those that were there during the day, correct?
20 A. Well, it would depend on the activity. I
21 couldn't say during that time frame -- I wasn't in
22 charge of that department, so I'm sure -- just as I
23 would schedule people for the bulk of the
24 activities, so if they had something going on in the
25 evening, I'm sure they would schedule for more in
26 the evening than they would during the day.
27 Q. Fair enough. But that would be the
28 exception, not the rule, though, correct? 9573

A. No, that's what we had to work with, so you schedule your people when you need them.
Q. No. I meant, it would be the exception that they would have to be there because you were having an event as opposed to the normal situation. You don't have events every night?
A. No, we don't have events every night. But if we have large groups of guests on property, such as during that time period, then, you know, dinner may be served late. I'm not sure exactly what all their duties are, but....
Q. But that would be an exception where those -- where you would have those kind of events. Obviously you'd have to have people there to help, correct?
A. Yes.
Q. Now, you say that the security staff is not allowed in the building -- I'm sorry, in the main residence unless called by the defendant, Mr. Jackson, or there's an emergency, correct?
A. If it's not necessary for you to be in the house.
MR. SNEDDON: Move to strike as nonresponsive, Your Honor.
THE COURT: Stricken.
Q. BY MR. SNEDDON: I think you told us that the only two occasion where staff, security staff, were allowed into the house was either because Mr. 9574

Jackson summoned one of you or there was an emergency. Now, is that correct?
A. Yes.
Q. You have on occasion been in Mr. Jackson's bedroom, correct?
A. Yes.
Q. And you know that to get into Mr. Jackson's bedroom, as you approach the door, there's a chime that goes of inside of the room, correct?
A. Yes.
Q. And you also know that the door is locked from the inside, correct?
A. I believe there may be a deadbolt there.
Q. And that a person cannot -- you cannot enter that room without somebody unlocking the door from the inside, correct?
A. If there's an emergency, I would get through that door.
Q. I'm sure you would. I'm not trying to say you wouldn't do your job and break through it. But short of breaking through the door, you would have to have somebody on the inside open it up, correct? Is that a fair statement?
A. Yes.
Q. And certainly if that was true of you, it would certainly be true of any guest that was staying at the place, correct?
MR. SANGER: Objection; calls for 9575

speculation.
THE COURT: Sustained.
Q. BY MR. SNEDDON: At the time that these young boys that you've talked about were in the main residence with Mr. Jackson, they were there without -- on many occasions without parental supervision, correct?
A. I would say there were some occasions. I don't know if there were many occasions.
Q. I'll settle for "some."
There were some occasions where some of these young boys were in the house with Mr. Jackson with nobody else present; is that a fair statement?
A. I would say that would be fair.
Q. It would also be a fair statement that inside of his room, that nobody would be allowed to go in there and see what was going on; isn't that a fair statement?
MR. SANGER: Objection, Your Honor. Calls for speculation; no foundation.
THE COURT: Sustained.
THE WITNESS: I would say that would be normal for anyone.
THE COURT: Wait. The question was sustained, the objection.
Q. BY MR. SNEDDON: So the simple answer would be, you had no idea what was going on inside the house when those boys were there with Mr. Jackson? 9576

MR. SANGER: Objection; argumentative.
THE COURT: Sustained.
MR. SNEDDON: Do you want to take the break, Your Honor?
THE COURT: All right. We'll take our break.
(Recess taken.)
THE COURT: All right. Go ahead.
Q. BY MR. SNEDDON: Mrs. Silva, are you familiar with a company called Ace Protective Group?
A. Yes.
Q. And do they provide security services for the ranch?
A. Yes.
Q. That's in addition to the regular staff that's on the ranch?
A. We used them as contract. The employees were supervised, managed on the ranch, and they officially paid payroll services.
Q. Were they just used for special occasions or were they there all the time?
A. No, they were used from the time period of, I believe, 1997 through 2003, I believe.
Q. So, for instance, somebody who was working as a security officer on the ranch during that time period, they would actually be employed by the Ace Protective Group as opposed to MJJ Productions or the defendant?
A. Yes, some were. 9577

Q. And some were not?
A. Some were not.
Q. But they all worked under your supervision?
A. Yes.
Q. Thank you.
Now, let's talk a little bit about the ranch. You described some behavior where Gavin Arvizo crashed in a golf cart.
A. Yes.
Q. That happened -- I believe Mr. Sanger showed us it was in, as I recall, June of 2002.
A. Yes.
Q. And there's no log entry in any of the logs in 2003 that indicate that Gavin ever had his driving privileges taken away on the golf carts, are there?
A. I would have to look at the gate logs to see. I believe what the report said was that a verbal warning was given.
Q. In 2002?
A. Yes.
Q. Yes. We had that report.
A. Yes.
Q. But to your knowledge, you don't recall any situation where Gavin Arvizo was later, during the time in 2003 while they were on the ranch, deprived of his privileges to drive golf carts, correct?
A. In 2003, he did have a golf cart taken away 9578

from him.
Q. Do you recall what date that was?
A. It was written on the same line where I believe there was an accident that happened with -- that involved Mr. Brando's grandson. As a result of that accident, the golf carts were taken away.
Q. And your recollection is it was taken away from Gavin and from Shane?
A. Yes.
Q. So it would be that accident report?
A. Pardon me?
Q. It would be that accident report, correct?
A. I believe that incident, the golf carts were temporarily taken away from them.
Q. You've described a situation where, I believe, in the past that you thought that at one point or another, every one of the young boys that would visit that ranch got carried away, correct?
A. Not all of them. But I would say they had fun.
Q. Do you recall telling -- do you recall a conversation that you had with a sheriff's department detective?
A. Yes.
Q. And do you recall him asking you about the conduct of a couple of young boys?
A. Yes.
Q. And you said to him that they all did; "At 9579

1 one point or another, they would all have to calm
2 down, and we'd all have to take things away from
3 them, all of them"?
4 A. I would say there was an occasion where all
5 of them needed to be reminded of what the rules
6 were.
7 Q. So you didn't tell them that on all
8 occasions, eventually somebody had to have something
9 taken away from them?
10 A. The way you asked the question, I believe
11 what you're asking me is every single person has had
12 a golf cart taken away. Is that what you're asking?
13 Q. No. Just the young boys.
14 A. One occasion we would have to remind them,
15 again, to follow the rules.
16 Q. And you said that -- you thought the reason
17 for that was because the children felt there was so
18 much freedom at Neverland Ranch, correct?
19 A. Yes.
20 Q. And you also said that you never saw Mr.
21 Jackson ever tell the children to calm down or not
22 do anything, correct?
23 A. Yes.
24 Q. And you felt -- you told the officer that
25 you felt that at times you were forced to be the bad
26 guy because Mr. Jackson wouldn't do that when you
27 thought he should; isn't that correct?
28 A. He's the host, so that's not his job. 9580

MR. SANGER: I'm going to object, Your Honor. It calls for hearsay.
THE COURT: Overruled.
THE WITNESS: I didn't hear what his reply is.
THE COURT: You should rephrase the question. It was complicated.
Q. BY MR. SNEDDON: You also told the investigator that you felt it was unfair at times that you and your security officers were placed in a bad position because Mr. Jackson would not discipline people?
MR. SANGER: Objection; calls for hearsay.
Q. BY MR. SNEDDON: In his presence, correct?
A. In his presence, it wouldn't be appropriate for him, as a host, to discipline. That would be our job. So he was relying on us to do our job.
Q. Did you tell the officer that you felt that Mr. Jackson had placed you in a position of being the bad guys?
A. Sure.
Q. Now, you stated that you had no personal knowledge about reports of children being intoxicated on the ranch, correct?
A. Correct.
Q. As a head of security, do you review the logs all the time?
A. At the end of the week I review them. 9581

Q. And you discuss with your staff any concerns about things that may be going on on the ranch to make sure everything's okay?
A. On a daily basis.
Q. You did receive some reports, did you not, that there were children intoxicated on the ranch?
A. I did not receive any direct report, someone coming to me and reporting that they found someone intoxicated.
Q. But you had information to that effect, did you not, as the head of security?
A. There is always a concern for it, because there's alcohol available, so we would make -- take precautions to make sure that that wouldn't happen.
Q. I think the question was, did you have personal -- I mean, did you have knowledge of the fact from your staff that there were incidents where they encountered children intoxicated?
A. I was not --
MR. SANGER: Excuse me.
Calls for hearsay.
THE COURT: Overruled.
You may answer.
Q. BY MR. SNEDDON: I think that's a "yes" or "no."
A. No.
Q. Are you familiar with a person by the name of Chris Carter? 9582

A. Yes.
Q. Who is Mr. Carter?
A. Mr. Carter was a personalassistant/traveling
security person for Mr. Jackson.
Q. So when Mr. Jackson was around, Mr. Carter
was around. He was his security, correct?
A. Yes. No, he was not under my supervision.
Q. No, I know. I mean, the jury may not know,
but he worked for -- basically for Mr. Jackson?
A. Yes.
Q. But when Mr. Jackson was at the ranch, Mr.
Carter was at the ranch, right?
A. Most of the time.
Q. And did Miko Brando on occasion also serve
as part of the security detail for Mr. Jackson, to
your knowledge?
A. I'm not aware of that.
Q. And have you ever seen Mr. Jackson carry a
cell phone?
A. No.
Q. Have you ever seen Mr. Jackson use a cell
phone?
A. No.
Q. Did you ever see any of these personal
bodyguards loan Mr. Jackson a cell phone to be used?
A. No.
Q. Now, at the time that the Arvizos came to
visit in early February of 2003, did you know that 9583

1 they had come from Miami?
2 A. No.
3 Q. Did you know where they had come from?
4 A. No.
5 Q. Did you know how much clothing they had with
6 them or how long they were expected to stay at the
7 ranch?
8 A. No.
9 MR. SANGER: Compound, Your Honor. Move to
10 strike the answer.
11 MR. SNEDDON: I'll break it up.
12 Q. Did you know --
13 MR. SANGER: Excuse me. I just need a --
14 THE COURT: He's going to rephrase.
15 Stricken.
16 MR. SANGER: So it's stricken. There was a
17 motion to strike the answer.
18 THE COURT: Stricken.
19 Q. BY MR. SNEDDON: Did you know how much
20 clothing they brought with them?
21 A. No.
22 Q. Did you know how long they were supposed to
23 stay?
24 A. No.
25 Q. Did you know where they had been before they
26 came to Neverland Ranch?
27 A. No.
28 Q. Did you know that they came to the ranch 9584

with the defendant, Mr. Jackson?
A. I did not see that personally.
Q. But you're aware of that?
A. Yes.
Q. Now, during the time that the Arvizo children were at the ranch in February of 2003, and in March, you observed Mr. Jackson spend time with the boys, did you not?
A. I recall Mr. Jackson was there, but I don't recall any specific interaction with them.
Q. You don't recall Mr. Jackson spending time with Gavin Arvizo?
A. Not specifically.
Q. And during most of this particular point in time, you would be leaving in the early evening hours to go home, correct?
A. My hours were varied at that time, depending on the coverage that we needed.
Q. All right. And so -- but ordinarily, you would leave to go home in the early evening hours, correct?
A. No, sir.
Q. So if we were to look at your time sheets they would reflect the fact that -- are you, by the way, filled out on the logs?
A. Yes.
Q. Your name's on the logs, so we can look at the logs and we can all find out what time you 9585

checked in and what time you checked out for the day?
A. Yes.
Q. That would be an accurate depiction of your work schedule during February and March of 2003?
A. Yes.
Q. Is that correct?
A. Yes.
Q. Now, did you basically run things from the administration building?
A. Depended on the activity. If the -- if I had enough officers to cover the shift, then I would come down and supervise the shift and then I'd work from my office. If not, I was part of the rotation as well.
Q. So it's your testimony that you have no recollection of Mr. Jackson being in the presence of Gavin Arvizo, for instance, in the arcade room playing games?
A. I can't recall specifically.
Q. You have no recollection of Gavin Arvizo being with Mr. Jackson in the movie theater?
A. I'm sure it was possible, but you're asking me specifically, and I don't remember an occasion. There was a lot of people there during that time, and people were coming and going, so --
Q. I'm just asking what you recall. Do you recall any situation where you recall Gavin Arvizo 9586

being with the defendant down in the amusement park?
A. No.
Q. Do you recall any situation where Gavin Arvizo was with the defendant down at the zoo?
A. No.
Q. Do you recall any incident or occasions of Mr. Jackson being with Gavin Arvizo around the swimming pool?
A. No.
Q. Or out at the teepee?
A. I believe they may have had dinner there once.
Q. It's true, is it not, that Gavin Arvizo spent some of the nights in Mr. Jackson's house?
A. Yes.
Q. I'm assuming, as one of your chief responsibilities there as the security officer at this point in time in 2003, that you would try to be very proactive about liability issues on the ranch, correct?
A. Yes.
Q. In other words, sort of like a loss prevention concept; you want to make sure that you run things so that accidents are prevented before they happen, correct?
A. Yes.
Q. And you put procedures in place to avoid that kind of situation, right? 9587

A. Yes. We have standard operating procedures.
Q. And also as part of those procedures, one of the things to protect yourself from a liability standpoint is, if there's something that's significant that happens on the ranch, you want to put it in the logs so later, if it happens, it could be documented, correct, for liability purposes?
A. Personally, I would do that myself. I'm relying on the discretion of the officers.
Q. Well, you would expect, as you, they worked under your supervision, correct?
A. Yes.
Q. They worked under your direction?
A. Right.
Q. And you would expect that if any significant event occurred on the ranch, that would be documented in the reports, correct?
A. Reports or gate logs, yes.
Q. At someplace where --
A. Yes.
Q. -- something would happen that's out of the ordinary, that that would be something that you'd want to document?
A. Yes.
Q. To show that if an incident occurred, that you took a response to it to prevent it from happening again, correct?
A. Yes. 9588

1 Q. You want to document that event, correct?
2 A. Yes.
3 Q. Okay. And as part of that policy, you had a
4 rule that the golf carts couldn't go off the ranch,
5 right?
6 A. They're not designed to go off the property.
7 They shouldn't go off, no.
8 Q. I just asked --
9 A. Yes. Yes.
10 Q. And if somebody tried to drive a golf cart
11 off the ranch, they would be stopped by the gate
12 person and turned around and told to head back out,
13 correct, head back to the ranch?
14 A. That would be our procedure.
15 Q. That would be a standard procedure?
16 A. It would be our policy.
17 Q. Okay. And somebody who let a person off the
18 ranch with the cart would be in a little bit of
19 trouble, wouldn't they, with you?
20 MR. SANGER: Objection; calls for
21 speculation.
22 MR. SNEDDON: Let me rephrase it. I'm
23 sorry, Judge.
24 Q. It would be a violation of your policies for
25 somebody at the gate to allow somebody off the ranch
26 with a go-cart; is that correct?
27 MR. SANGER: Well, I'm going to --
28 Are you talking about a go-cart or a golf 9589

cart?
MR. SNEDDON: Golf cart.
THE WITNESS: It would be against our policy to allow someone -- someone underage, without driving privileges, to leave the property.
Q. BY MR. SNEDDON: So “underage” would be anybody 16 and below?
A. Driving age, yes.
Q. Or below 16.
A. Driving age, yes.
Q. And the same thing was true of the quads?
A. Yes.
Q. In other words, there was a rule at the gate that you just didn’t let somebody off with the quads?
A. Yes.
Q. Now, in 2003, did you know how old Gavin Arvizo was?
A. No.
Q. He was small for his age in 2003, was he not?
A. I don’t know.
MR. SANGER: Objection. Calls for speculation; lack of foundation.
THE COURT: Sustained.
Q. BY MR. SNEDDON: He was a rather small person, was he not?
A. No. 9590

Q. In 2003?
A. I don't know how old Gavin was at the time.
Q. What's your estimate?
A. My estimate would be that he was 15.
Q. 15? And how old do you think Star was?
A. At least 12 or 13 years old.
Q. You told the jury that the reason that there's a notation in the logs about the boys not leaving the ranch was because they had been driving vehicles around the ranch, correct, the Navigator and the van?
MR. SANGER: Objection, Your Honor. That misstates the testimony.
MR. SNEDDON: Well, I'm -- let me go back. I'll clarify that. I thought that's what she said. I'll withdraw the question, Your Honor.
THE COURT: All right.
Q. BY MR. SNEDDON: Was the reason that the notation that Mr. Sanger showed you up there on the board about the boys not to leave the ranch related to their driving of the Navigator or the van?
A. Yes.
Q. Okay. So I was right. You don't have to answer that.
At any time in any of those logs, did you ever see a notation that documented the fact that those boys were driving those cars?
A. No.

Q. And you say that the policy of the ranch is to lock the key to the cellar in the safe, correct?
A. On certain occasions it is.
Q. But the policy of the ranch was to leave keys in the cars on the ranch? You didn't secure them somewhere?
A. No.
Q. You don't think that would be a liability problem if somebody got in one of those cars and drove it off?
MR. SANGER: Objection; argumentative.
THE COURT: Sustained.
Q. BY MR. SNEDDON: Did it ever occur to you as the chief of security during this period of time that there was a liability issue to the ranch by leaving those keys in the cars unattended?
A. No.
Q. Did you change the procedure at any time? Are they still left in the carts?
A. At this time, I believe they are. Some vehicles are locked.
Q. I assume locked, and the keys aren't locked inside of them. So they're placed somewhere else, correct?
A. No. Correct.
Q. And it's also true that at no time during the time that you've been employed by that ranch do you recall there ever being an entry in a log that 9592

children were not to leave the ranch, correct?
A. That's correct.
Q. And that, as a matter of fact, on those occasions you told the ladies and gentlemen of the jury that, for instance, Wade Robson was at the ranch without supervision, you don't find any entry saying, "Don't let Wade Robson leave the ranch unsupervised," correct?
MR. SANGER: Objection. Assumes facts; compound.
THE COURT: Overruled.
You may answer.
THE WITNESS: Answer?
Q. BY MR. SNEDDON: Yes. There's nothing in the logs to that effect, right?
A. I'd have to go through all the gate logs.
Q. Do you have any recollection, as the head of security, that there was ever an entry like that with regard to Wade Robson?
A. No.
MR. SANGER: Objection; lack of foundation.
THE COURT: Overruled.
Q. BY MR. SNEDDON: With regard to Brett Barnes, you've told the jury already that he's been there on occasion without his parents.
Do you ever recall, during the time that he was on that ranch, that there was a notation in the logs that he was not to leave the ranch? 9593

A. I did not see one.
MR. SANGER: I'm sorry. I was trying to object. Objection. One second. Objection; lack of foundation.
THE COURT: They can't hear.
MR. SANGER: Objection. Lack of foundation as to the 1990 gate logs, '90 to '93.
THE COURT: Sustained.
Q. BY MR. SNEDDON: During the time that you were employed on the ranch as a security officer between the time period of 1991 and 1993, you've told us that Wade Robson visited the ranch, correct?
A. Yes.
Q. And at that time, you would have been one of the officers who would review the entries on the log to make sure you do your job, correct?
A. Yes.
Q. And you would have done that on a daily basis when you came to work; isn't that correct?
A. Yes.
Q. And do you recall any log entries during that period of time in which somebody wrote a note saying, "Don't let Wade Robson leave this ranch"?
A. No.
Q. And with regard to Brett Barnes, during the same time period that you were working as a security officer and you were reviewing those logs, did you ever see an entry that said anything about not 9594

letting Brett Barnes leave the ranch?
A. No.
Q. Now, if I were to ask you the same question about Jordan Chandler, your answer would be the same, correct?
A. Correct.
Q. In fact, the entry that was made on the logs that you testified to, that Mr. Sanger showed you, was the first and only time you've ever seen that kind of entry made on a ranch log, correct?
A. Yes.
Q. Are you familiar with some boys from Santa Ynez called the Coultry brothers?
MR. SANGER: Objection; beyond the scope of direct.
THE COURT: Overruled.
MR. SNEDDON: I think I'm entitled to -- I think....
Q. It's overruled. You can answer.
Are you familiar with the Coultry brothers?
A. Yes.
Q. And they were visitors at the ranch quite often, is that correct, during this time period, 2003?
A. I believe after that time period.
Q. You don't recall them being on the ranch during 2003?
A. Yes, but after the February time. 9595

Q. Yeah. No --
A. Not during the same time.
Q. -- that's fair.
A. Yes.
Q. During 2003 they were there?
A. Yes.
Q. And by your own statement to investigators, I think you described them as wild, correct?
A. Yes.
MR. SANGER: Objection. Move to strike; calls for hearsay. Also not relevant as to the time period that what we're talking about.
THE COURT: Overruled. The answer was, "Yes." Next question.
Q. BY MR. SNEDDON: In fact, while they were on the ranch one day, they egged your car so bad that you had to get it repainted, correct?
MR. SANGER: Objection, Your Honor. Relevance.
THE COURT: Overruled.
You may answer.
THE WITNESS: I don't know if it was them.
Q. BY MR. SNEDDON: Somebody did, correct?
A. Someone did, yes.
Q. And they were on the ranch at that time?
A. Yes.
Q. All right. During the time that you were employed at the ranch, were you ever aware of who 9596

was sent out to buy adult magazines for Mr. Jackson?
A. No.
Q. Did you receive in your office a package of adult magazines that came from Japan?
A. Yes.
Q. And those were -- the contents of the envelope were from Mr. Jackson's luggage that was mailed back to Neverland after he had gone to Japan, correct?
A. I don't know if it was from Japan, but they were left in my office.
Q. And they were adult materials, correct?
A. Yes.
Q. And you described them, I think, as very graphic?
A. Yes.
MR. SNEDDON: No further questions, Your Honor.

REDIRECT EXAMINATION
BY MR. SANGER:
Q. Okay. Mr. Sneddon asked you about various guests coming with or without parents, one parent or the other. Do you remember that, at the beginning of your cross-examination?
A. Yes.
Q. Okay. Now, the Arvizos -- to your knowledge, the Arvizos came with at least their 9597

father the first several times they came; is that correct?
A. Yes.
Q. And he -- did he supervise them?
A. Yes.
Q. And then there was a period of time in 2002 when they came with Chris Tucker; is that correct?
A. Yes.
Q. And that's Chris Tucker the entertainer, right?
A. Yes.
Q. And Mr. -- was Mr. Jackson on the premises or not, or sometimes on and sometimes off?
A. Yes.
Q. The latter?
A. Sometimes yes; sometimes no.
Q. All right. Was Mr. Tucker supervising the Arvizo kids while he was there?
A. Yes.
Q. All right. And then after that, the Arvizo kids came with their mother. That was in February of 2003, correct?
A. Yes.
Q. And she was on the property most of the time that they were on the property; is that right?
A. Yes.
Q. She was not there some of the time, though?
A. Correct. 9598

Q. All right. Now, you just indicated that --
you were asked about these gate logs going back to
‘91 to ‘93. Do you remember that?
A. Yes.
Q. And from 1991 to 1993, you were not the
chief of security; is that correct?
A. That’s correct.
Q. So it was not your job to review all of the
gate logs; is that right?
A. That’s correct.
Q. It was your job to look at the gate logs
when you came on your shift to see if there was any
information that you should pick up for use during
your shift, correct?
A. Correct.
Q. That would include figuring out who’s on the
property, if there are any special instructions and
that sort of thing, right?
A. Yes.
Q. All right. Did you -- for the purpose of
testifying here today, did Mr. Sneddon or anybody on
his staff show you the gate logs from 1991 to 1993?
A. No.
Q. Have you had a chance to review those gate
logs in recent years?
A. No.
Q. All right. Now, you indicated that the only
entry that you recall with regard to children not 9599

leaving the ranch was that one entry on February the 19th?
A. Yes.
Q. All right. And that entry was only for that particular day; is that correct?
A. That's correct.
Q. It was not carried forward beyond February the 19th?
A. Correct. No.
Q. And the entry -- that was the first entry, so it obviously didn't precede the 19th, correct?
A. Correct.
Q. You indicated that one of the reasons was -- that that -- let me withdraw that.
You indicated that one of the reasons that the notation was in the log, you believed, was because of the kids driving the adult vehicles, correct, the Navigator and the Astro van and so on?
A. Correct.
Q. Was it also -- were there any other factors related to that entry that you're aware of?
A. Well, the children were there unsupervised as well, so --
Q. Okay. So there wasn't a parent there, or somebody like Chris Tucker, to make the call as to whether or not they should leave and who they should leave with; is that correct?
A. Correct. 9600

Q. Do you recall if Hamid Moslehi was on the property at that time?
A. Yes.
Q. Was he?
A. I'm sorry?
Q. Was he?
A. Yes, he was.
Q. All right. And did he leave that day?
A. I believe he did. There was an entry above that that said that he was there.
MR. SNEDDON: Well, I'll object as lack of foundation. No personal knowledge.
THE COURT: Overruled.
MR. SANGER: I think the answer is in.
THE COURT: The answer is in.
Q. BY MR. SANGER: Do you have a personal recollection of him being there around that time?
A. Yes.
Q. Okay. Do you know if he left later that day with the children, with the Arvizo children?
A. I don't know.
Q. All right. But if you wanted to find out, you would probably be able to look in the log and determine whether that's the case or not; is that correct?
A. Sure.
Q. And generally if somebody leaves the ranch at the exact same minute, if there are a group of 9601

people or a number of people who leave at the exact same minute, it generally means they're in the same vehicle; is that correct?
A. Yes.
Q. Now, I think you were asked -- and I may be wrong about this. I think you were asked if Wade Robson and Brett Barnes had behavior problems. Let me ask you, did they?
A. No.
Q. Were they polite? Impolite? How would you characterize them as kids?
A. They were very kind and considerate.
Q. Okay. Did they ever, to your knowledge, get into an adult vehicle and start driving around without permission?
A. No.
Q. Okay. Going back towards the beginning of your cross-examination, Mr. Sneddon asked you about Frank Cascio. Do you recall?
A. Yes.
Q. And he asked you if Frank Cascio started using a different name, that is, Tyson, at some point; do you recall?
A. Yes.
Q. Did, in fact, the entire Cascio family start using a different last name?
A. Yes.
Q. Did they all ask to be called "Tyson" 9602

instead of “Cascio”?
A. Yes.
Q. Did you honor that request?
A. When I could remember.
Q. Okay. Now, with regard to Frank Cascio/Tyson, you were asked whether or not he was a close, trusted friend of Mr. Jackson, I think, something to that effect. Do you recall that?
A. Yes.
Q. Did Frank Cascio -- did his relationship with Mr. Jackson have difficulties at one point?
MR. SNEDDON: Object; lack of foundation.
THE COURT: Sustained.
MR. SNEDDON: And vague.
MR. SANGER: Okay.
THE COURT: Sustained as to foundation.
MR. SANGER: All right.
Q. You had indicated that Frank Cascio was a close, trusted friend of Mr. Jackson --
A. Yes.
Q. -- correct?
Was that consistently true, or was there any change in that relationship from time to time?
MR. SNEDDON: Object. Calls for a conclusion; lack of foundation.
THE COURT: Overruled.
You may answer.
THE WITNESS: Yes, it did change on 9603

1 occasion.
2 Q. BY MR. SANGER: Was there a time when Mr.
3 Cascio threw a big party?
4 A. Yes.
5 Q. And did that result in the depletion of
6 ranch resources?
7 A. Yes.
8 Q. Okay. Did that cause a problem between Mr.
9 Cascio and Mr. Jackson?
10 A. Yes.
11 Q. You were asked about the key to the wine
12 cellar, and the part that I'd like to get to is how
13 many keys were there to the wine cellar, to your
14 knowledge?
15 A. To my knowledge, there were a set of keys in
16 the house for the housekeeping staff, a set of keys
17 in the security office.
18 Q. Did somebody walk around with those keys, a
19 security officer walk around with the keys, or were
20 they there at the office to be retrieved?
21 A. They're on a key ring and they're kept with
22 the supervisor.
23 Q. Okay. And when you say "security office,"
24 are we talking about the office that's adjacent to
25 the garage and the video library?
26 A. Yes.
27 Q. So obviously, if somebody had to use it,
28 they'd take the key ring and they go use it, right? 9604

A. Yes.
Q. Are they supposed to put it back?
A. Yes.
Q. Does that always happen?
A. No, not always. It stays on them sometimes.
Q. There was a question -- I think the question was about opening the wine cellar. Maybe I'm wrong about that. But in any event, at the time of the search, did you have the keys for the wine cellar?
A. Not on me.
Q. Okay. And the officers who wanted to search asked to have the key for the wine cellar; is that correct?
A. Yes.
Q. And did you retrieve the security keys or the housekeeping's keys?
A. I don't recall at the time. But I may have -- I was talking with the housekeepers. I was actually in the house at the time. So to quickly retrieve the keys, I may have grabbed the keys from them or asked for them from the housekeeper.
Q. So that -- at that time, to your knowledge, there was a set of keys for the security staff?
A. Yes.
Q. All right. And that included the key to the wine cellar; is that correct?
A. Yes, that's correct.
Q. Now, there was some questions about -- there 9605

were questions about the door to Mr. Jackson's
private area, sometimes called his bedroom or
bedroom suite, that area, all right? And you said
something about them being locked from the inside.
Do you recall that?
A. Mr. Sneddon asked a question.
Q. All right. Is it possible to open that door
from the outside?
A. With a key, yes, I imagine so.
Q. Okay. Was there a keypad, an electronic
keypad there?
A. Yes.
Q. And did certain people have the combination
to that keypad other than Mr. Jackson?
A. Yes.
Q. Who would have had that?
A. Whoever was cleaning his room at the time.
Certain guests. And certain house staff.
Q. All right. Did security have the keypad
number to his private quarters?
A. No.
Q. Did security have the keypad numbers to
other doors in the house?
A. Back door only.
Q. How about the front door?
A. No.
Q. So if security needed to get inside the
house, they would have to go through -- without a 9606

key, they'd have to go through the back door?
A. Yes.
Q. That's the door most people use anyway to come in and out of that house; is that right?
A. Yes.
Q. If you're visiting formally, you're an invited guest, you come through the front door, I take it, correct?
A. Yes.
Q. At least when you arrive, right?
A. Yes.
Q. And thereafter, if you're staying overnight, you probably just go through the back door, right?
A. Correct.
Q. Now, is there also a key, as opposed to a keypad, is there a key to unlock the back door?
A. Yes.
Q. And security had one of those?
A. Yes.
Q. And is it a different key or the same key to unlock the front door?
A. Yes.
Q. Did security have one of those?
A. Yes.
Q. And security did not have, to your knowledge, the keypad number or the key for Mr. Jackson's room?
A. No, we did not. 9607

Q. Now, you had the key to go into the back patio; is that right?
A. It's only locked. There's just a lock, not a keypad.
Q. Okay. But a key?
A. A key, yes.
Q. So did security have a key to go through the patio?
A. Yes.
Q. All right. So you could get in -- if you needed to get in through the patio, you could go in through that way; is that correct?
A. Yes.
Q. Did you have a key to the back door to Mr. Jackson's suite?
A. I don't believe we did.
Q. You never had occasion to try it, in any event; is that correct?
A. No.
Q. Now, you were asked whether or not you were put in the position of being the bad guys sometimes; is that right?
A. Yes.
Q. Could you explain what you mean by that?
A. Well, our position is to make sure that the guests are being in a safe position, they're not being jeopardized. Mr. Jackson is the host. And it's his position to be gracious and accommodating. 9608

That was our job. “Bad guys” is more of a -- “bad guys.” Not that we were bad, but it was part of our job, and we did it, and we did it consistently. And that’s what we did.
Q. All right. So, are you complaining about being put in that position?
A. No.
Q. Okay. I kept interrupting. You’re getting a drink of water, so I waited there for a moment.
A. Okay.
Q. In other words, that was part of your function was to be the ones that would draw the line on some of the safety issues, particularly with regard to the equipment; is that right?
A. Yes.
Q. Sometimes people want to ride Mr. Jackson’s Harley?
A. Yes.
Q. And are there times when you’d have to be the bad guy with regard to that?
A. Yes.
Q. And you’d do that graciously as well?
A. Yes.
MR. SANGER: Okay. Now, I’ve noticed Mr. Sneddon is using the exhibit. I don’t object to that, but I’m going to use it in just a minute, so -- okay. Thank you.
May I ask leave of the Court to approach the 9609

witness with the exhibit, or with the book, and it includes Exhibit 335, if I may?
THE COURT: Yes.
MR. SANGER: Thank you.
There's some water spilled there so -- people do that all the time.
MR. SNEDDON: Counsel, what's the date? Just give me the date.
MR. SANGER: Just one second. I'm going to start with March the 6th.
MR. SNEDDON: Thank you.
MR. SANGER: And page 00194 of Exhibit 335.
Q. And, Miss Silva, you might want to pull that closer to you, whatever is comfortable for you to read, because I'm going to ask you to go through the logs from February the 6th, 2003, through March the 12th, 2003, and tell us, if you would, whether or not you're on the property each day and what your hours were.
A. From February 6th --
MR. SNEDDON: Your Honor, I'm going to object. The document speaks for itself. It's in evidence. Best evidence rule.
MR. SANGER: Well, the best evidence rule -- anyway, I won't argue.
THE COURT: Overruled.
THE WITNESS: On this day of March 6th of 2003, I was already on the property. We -- I was 9610

carried over from the previous day, and so I got off my shift at 6:30 a.m.
Q. BY MR. SANGER: You know what I really meant to do, now that I've said that out loud, is I meant to go back to February.
A. Oh, okay.
Q. That was the problem.
What I'd like to do is just get an idea of what your hours were during that time. You indicated on cross-examination that you could look at the logs and talk about what hours you were there. And I believe you said you thought you were there late from time to time. So if you can give us just a quick idea as you look through the logs -- you can do it day by day for a while, but give us a quick idea of what your general working days were like at that time.
A. On February 7th, 2003, I was carried over from the previous shift and went off duty at 0152 hours.
Q. So that meant you were there the night of February 6th, and you were there past midnight and then you went home; is that correct?
A. Yes.
Q. Okay. All right.
A. February 13th, 2003, I was carried over from the previous shift and was signed out at 7 a.m.
Q. So if you look back to the 12th, give us an 9611

idea of when you started.
A. I started at 1500 hours, which is three o'clock in the afternoon.
Q. So you went all night till the next morning?
A. Yes.
Q. All right. Go ahead.
A. On the 15th, I was carried over from the previous day and continued to work and carried over again, and I left my shift at 2125, which is 9 p.m.
Q. Okay. Well, just for the fun of it, go back to the day before. Don't move your hand. Go back to the day before, when you were carried over, and see when you started the day before.
A. I came in at 4 p.m.
Q. So 4 p.m., the whole night, the whole next day, and didn't leave until the day after that; is that correct?
A. Correct.
Q. Now, as Mr. Sneddon said, the records speak for themselves. So if somebody wanted to go through, they could figure out exactly when you were there; is that right?
A. Yes.
Q. But it's safe to say that you worked many evenings and many nights; is that correct?
A. Yes.
Q. You were asked if you could remember specific occasions that Mr. Jackson was together 9612

with the Arvizo children. Do you recall that?
A. Yes.
Q. And you said you can't recall specifically.
I think you recalled one dinner at the teepee; is
that right?
A. Yes.
Q. And was that -- how many people were at that
dinner; do you know?
A. There were other people there. Exactly how
many and who was there, I can't recall.
Q. Okay. Other than that one dinner with a
number of people, and the Arvizos being amongst
them, you say you don't have any other specific
recollection during that time period in 2003 of what
Mr. Jackson was doing, if anything, with the Arvizo
kids?
A. I don't recall ever seeing them together
during that time frame.
Q. Okay. So if they were together, you just
didn't see them; is that safe to say?
A. I didn't see them.
Q. Okay. Were there times during the February
or March period where the Arvizo children were
staying -- the Arvizo boys were staying in the guest
unit?
A. They were assigned a guest unit, yes.
Q. So you didn't go to check to make sure they
were in there? 9613

A. No.
Q. And this incident with the Coultry brothers -- how do you say that?
A. I don't know.
Q. However you say the brothers' names, the incident you talked about where somebody egged your car, first of all, you don't know if they did it, right?
A. I didn't see them do it.
Q. And secondly, that did not occur at a time when the Arvizos were on the ranch; is that correct?
A. That's correct.
MR. SANGER: Okay. No further questions.

RECROSS-EXAMINATION
BY MR. SNEDDON:
Q. Just a couple of questions. It won't be long.
A. Okay.
Q. Do you recall describing the atmosphere at the ranch with regard to children as being one that you, as a mother, would not allow your children to participate in?
A. Yes.
MR. SANGER: Objection; calls for hearsay.
THE COURT: Sustained.
MR. SNEDDON: I'm asking about her statement. 9614

THE COURT: That's sustained.
Q. BY MR. SNEDDON: Based upon what you saw at the ranch and your observations as a security officer during the period of time from 1991 to 2003, did you form an opinion with regard to whether you would ever allow your children to participate in the activities at the ranch as you saw them?
A. As a security officer, no.
Q. As a mother?
A. Yes.
Q. And that opinion is that you would not; isn't that correct?
A. That's correct.
Q. Now, you said that the entire Cascio family chose to have themselves referred to as "Tyson"?
A. Yes.
Q. Did I understand you correctly?
A. Yes.
Q. And when the Cascio -- when was that decision made, to your knowledge?
A. I can't recall at this time.
Q. Was it a decision that was made during February and March of 2003, or after?
A. I believe it was around that time.
Q. Do you -- in reviewing those logs for Mr. Sanger, do you see any occasion in those logs, from February 7th through March the 12th, where any member of the Cascio family is referred to as 9615

1 “Tyson,” other than Frank?
2 A. I would have to go through each page.
3 Q. Do you want to do that?
4 A. Sure.
5 Q. Go ahead.
6 A. What were the dates?
7 Q. From February the 7th until March the 12th.
8 A. I have one entry here.
9 Q. What’s the date on that entry?
10 A. The date of entry is February 28th, 2003.
11 Q. And the name?
12 A. There’s an entry in the “Directive” part of
13 our log.
14 Q. And the name?
15 A. “Tyson.” “Cascio family will go by Tyson
16 family.”
17 Q. That’s on the 28th?
18 A. Yes.
19 Q. The family wasn’t on the ranch that day, was
20 it?
21 A. The gate log shows they were on property.
22 Q. They’re not listed by “Tyson” on the log,
23 are they?
24 A. No, they’re carried over from the previous
25 day. The gate entry log was at 1700 hours. They
26 left property at 1917.
27 Q. And the first date where Frank Cascio’s name
28 is transferred to “Tyson” is on March 1st; isn’t 9616

that correct?
A. Continue looking?
Q. Go ahead and check it.
A. Thank you.
That's correct.
Q. Up to that time, it had been "Cascio" all the way?
A. Yes.
Q. Are you familiar with a person by the name of Vinnie Amen?
A. Yes.
Q. And he was at the ranch about the same time as Mr. Tyson during February and March, correct?
A. Yes.
Q. And do you have any idea why Mr. Amen's name was changed from "Vinnie Amen" to "Vinnie Black" on March 1st?
MR. SANGER: Beyond the scope of redirect.
MR. SNEDDON: Counsel opened the logs up.
THE COURT: Objection sustained.
Q. BY MR. SNEDDON: So your testimony is, then, that with regard to security, and you being the chief of security at the ranch, that you took greater precautions with regard to the key to the wine cellar than you did the keys to the cars?
MR. SANGER: I'm going to object. That's argumentative.
THE COURT: Sustained. 9617

MR. SNEDDON: No further questions.

FURTHER REDIRECT EXAMINATION

BY MR. SANGER:

Q. Don't book put the book away.

A. Okay.

Q. The book is open.

Let's just be clear. I think this is clear, but it is -- February 28th, 2003, that is the actual date when the directive came out to refer to the entire Cascio family by the last -- as "Tyson"?

A. Yes.

Q. That wasn't English. Let me try that again.

It was February 28th, 2003, that the directive came out that the entire Cascio family should be referred to as "Tyson"; is that correct?

A. Yes. February 28th.

Q. And so as far as you're concerned, when people remembered it, that's what they were supposed to do; is that correct?

A. Yes.

Q. And if somebody came through the gate and was logged in as a "Cascio" instead of a "Tyson," would that necessarily mean that someone was disobeying the directive?

A. No.

MR. SNEDDON: Object. Calls for a conclusion; speculation. 9618

THE COURT: Sustained.
MR. SANGER: Okay.
Q. Was this a preference that was -- let me withdraw that.
Who informed you that that was supposed to be the case, that as of February 28th, the Cascio family should be referred to as “Tyson”?
A. The gate log shows that it was per Joe Marcus.
Q. So you did not talk to Joe Marcus about that; is that correct?
A. No.
Q. And you saw it in the gate log along with other security staff; is that correct?
A. Right. Or I was briefed by a supervisor about it.
Q. Okay. As far as you know, did the staff make an effort to comply with that request?
MR. SNEDDON: Object. Speculation; conclusion.
THE COURT: Sustained.
Q. BY MR. SANGER: As the head of security, was it brought to your attention that anybody was deliberately disobeying that instruction?
A. No.
Q. And do you know -- beyond it coming from Joe Marcus, do you have any information as to who made the request? 9619

A. No.
Q. All right. You indicated --
Your Honor, this may reopen slightly, but let me ask this question and see how far we get.
As you were going through the gate logs just now, did you come across the entry where the golf carts were taken away from both Shane Brando and Gavin Arvizo?
A. I must -- I don't recall the date, but I'm sure it's in here.
Q. Did you see it as you were flipping through this time?
A. No, I don't believe I saw it in there.
Q. Okay.
A. I didn't grab the page and see it, but --
Q. You weren't looking for it. All right. I won't ask you to go back through it. It's either in there or it isn't.
Let me ask you, you indicated that you would have a concern as a mother about having your child stay at the ranch; is that right?
A. Not concern for them saying there, but perhaps some of the activity was beyond my comfort level.
Q. Okay. Now, you've -- without going into details about your private life, but you have children, right?
A. Yes, I have two daughters. 9620

Q. Okay. You have grandchildren?
A. Yes, twins.
Q. Would -- did you ever bring your family members to Family Day?
A. Yes.
Q. So your daughters as well?
A. Yes.
Q. So they've been there and they've played at the ranch and had fun on Family Day, correct?
A. Yes.
Q. Your concern was from your own personal standpoint as a mother, that you would not want to bring your children there on a regular basis; is that right?
A. On a regular basis, no.
MR. SANGER: All right. That's fine. Okay. I have no further questions.
MR. SNEDDON: Nothing further.
THE COURT: Thank you. You may step down. Call your next witness.
MR. SANGER: The next witness will be Ramon Velasco.
And Mr. Velasco is going to be assisted by the Spanish language interpreter, the court interpreter.
THE COURT: When you get to the witness stand, please raise your right hand and face the clerk. 9621

1
2 RAMON VELASCO
3 Having been sworn, testified as follows:
4
5 THE WITNESS: Yes, I do swear.
6 THE CLERK: Please be seated. State and
7 spell your name for the record.
8 THE WITNESS: Ramon Velasco.
9 THE INTERPRETER: May I spell, Your Honor?
10 THE COURT: Yes.
11 THE INTERPRETER: R-a-m-o-n; V-e-l-a-s-c-o.
12 THE CLERK: Thank you.
13
14 DIRECT EXAMINATION
15 BY MR. SANGER:
16 Q. Okay. Mr. Velasco, you asked to be assisted
17 by a Spanish language interpreter in court; is that
18 correct?
19 A. Yes, correct.
20 Q. Thank you. And we respect that choice.
21 You do speak English to a certain extent, is
22 that correct, sir?
23 A. Yes.
24 Q. Spanish is your first language?
25 A. Yes.
26 Q. And you feel more comfortable speaking in
27 Spanish than in English; is that correct?
28 A. Yes. 9622

Q. Now, let me ask you if you know the gentleman seated right here.
A. Yes, I do know him.
Q. Who is that?
A. Mr. Michael Jackson.
Q. Okay. And have you worked for Mr. Jackson at Neverland Ranch?
A. Yes, I did work.
Q. And when did you go to work at Neverland Ranch?
A. I started in the year 1989. And I stopped around 1999.
Q. Did you work continuously during that period of time?
A. Not the whole time.
Q. Did you take any breaks from working there?
A. Well, I injured my back, and I was operated on.
Q. All right.
A. And I was given the opportunity to return again.
Q. All right. So you were off for a period of time with a back injury?
A. Yes, correct.
Q. When was that?
A. 1991.
Q. How long were you off?
A. About eight months. 9623

Q. All right. So other than that eight-month period, you've been a regular employee at the ranch?
A. Yes, of course.
Q. And what was your first job assignment when you went to work at the ranch?
A. Taking care that the game would not eat the flowers.
Q. Okay. Did you win or did the game win?
A. The deer; the deer won.
Q. Okay. So you worked as a gardener for a period of time?
A. Yes, of course.
Q. About how long was that?
A. I cannot recall exactly.
Q. Was it a matter of months or years?
A. Several years.
Q. All right. And then after doing -- or working in -- working as a gardener, did you take on another job?
A. Yes.
Q. And what was that?
A. Assisting the cook to -- by washing dishes.
Q. All right.
A. And other things.
Q. Okay. And how long did you do that?
A. Several years.
Q. And you left employment at the ranch in 1999, correct? 9624

A. Yes.
Q. What was your job at the time you left employment?
A. I worked full time in the kitchen.
Q. All right. And you assisted the cook?
A. No, at that time I was the one in charge.
Q. Oh, you were the cook. I'm sorry.
A. Yes.
Q. Okay. Now, when you were -- when you were working as the cook -- first of all, you were working as the assistant to the cook and then as the cook. Did you work in the kitchen in the main house?
A. Yes, the whole house.
Q. And when did you first start working in the house?
A. I cannot recall exactly.
Q. Was it after your -- after you came back from your back injury?
A. Yes, correct.
Q. Okay. Do you recall how long after your back injury?
A. Could you please repeat that question?
Q. That's fine.
Do you recall how long it was after you returned to work from your back injury that you came to work in the house?
A. Right after my operation, it was almost 9625

immediately after. It was part time. Oh, partly outside, partly inside.
Q. So you started working partly inside in 1991, then?
A. Both places.
Q. And then when did you start working full time inside?
A. Really, I cannot recall. I wasn't in one place or the other.
Q. All right. Now, at the time you left, you were working full time inside; is that right?
A. Correct.
Q. Okay. Now, do you have a nephew?
A. Yes, of course.
Q. And is your nephew also -- did your nephew also work at the ranch?
A. Yes.
Q. Okay. Is that Carlos?
A. Yes, correct.
Q. Full name is Carlos Velasco?
A. Correct.
Q. First of all, let me ask you about Jason Francia. Do you remember Jason Francia?
A. Yes, I do.
Q. Did your nephew spend time with Jason Francia?
MR. AUCHINCLOSS: Objection; foundation.
THE COURT: Sustained. 9626

Q. BY MR. SANGER: Okay. Did you see your
nephew spend time with Jason Francia?
A. No, I do not recall that.
Q. Okay. Do you know if your nephew went to
school in the early ‘90s?
A. I do know that he did at that time, but I
don’t know the exact year.
Q. And your nephew Carlos went to school in
Santa Maria?
A. Yes, of course.
Q. Do you know if he went to the same school as
Jason Francia?
MR. AUCHINCLOSS: Objection; foundation.
THE COURT: Sustained.
MR. SANGER: All right.
Q. Now, did you know Blanca Francia?
A. Yes, I do.
Q. And who is Blanca Francia?
A. What is it, the response that you’re
seeking? If I know her as a friend or --
Q. Okay. I forgot what I asked, the exact
words. But in any event, did Blanca Francia work at
the ranch?
A. Correct.
Q. All right. And what was her job when you
first met her?
A. She would clean Michael’s room.
Q. All right. When you first met her, did you -- 9627

did you get along with her?
MR. AUCHINCLOSS: Objection; relevancy.
MR. SANGER: Foundation.
THE COURT: All right. Overruled.
THE WITNESS: What was the question?
Q. BY MR. SANGER: When you first met with her,
did you get along with her?
A. Yes.
Q. Okay. At some point, did you have occasion
to change your opinion of Blanca Francia?
MR. AUCHINCLOSS: Objection; relevancy.
MR. SANGER: Let me just withdraw it, then.
I'll make it easier, okay? If I may.
THE COURT: All right.
Q. BY MR. SANGER: At some point did you notice
that Blanca Francia's behavior with other employees
was impolite?
MR. AUCHINCLOSS: Objection. Leading and
relevancy.
THE COURT: Sustained.
MR. SANGER: On?
THE COURT: Both.
Q. BY MR. SANGER: Did you -- well, did you see
Blanca Francia have encounters with other employees
at the ranch?
MR. AUCHINCLOSS: Objection. Ambiguous and
relevancy.
THE COURT: Overruled. 9628

You may answer.
THE WITNESS: Would you please repeat the question?
MR. SANGER: Could I ask, please?
THE COURT: Yes.
Could it be read back?
(Record read.)
THE WITNESS: I did not see it. I heard it.
Q. BY MR. SANGER: Did you hear her talk to other employees?
A. Yes.
Q. How did she conduct herself with other employees?
MR. AUCHINCLOSS: Objection. Relevancy; hearsay; calls for a conclusion.
THE COURT: Sustained.
MR. SANGER: Dare I ask? All three?
THE COURT: Well, yeah. I'm not sure where you're going, so the foundation and conclusion is a valid objection. But maybe if I understood where you were going. Do you want to approach on this?
MR. SANGER: Could we, please?
(Discussion held off the record at sidebar.)
Q. BY MR. SANGER: All right. Now, while you were working at the ranch, do you know how long Blanca Francia was also there at the ranch?
A. She was there before me. But I don't know how many years. 9629

Q. And she left -- she left long before you did, right?
A. Yes, correct.
Q. Okay. During the time you were working at the ranch, do you know if there was a wine cellar?
A. Yes, there was.
Q. Was the wine cellar kept locked?
A. Yes, the whole time.
Q. Were children allowed in the wine cellar unaccompanied by Mr. Jackson or an adult or somebody; somebody in a position of authority?
A. Not that I was aware of.
Q. Where was the key to the wine cellar kept during the time you were there?
A. It was behind the door.
MR. AUCHINCLOSS: I'm going to object as to relevancy, given his -- the time that he left the ranch.
THE COURT: Sustained.
Q. BY MR. SANGER: Did you observe the Robson family at the ranch?
A. I did not personally see them. I was not really interested in who the people were. I was there to help them.
Q. Okay. You -- all right. You saw a number of families visit the ranch; is that right?
A. Yes, of course.
Q. And did you see Mr. Jackson engage in play 9630

with family members who visited the ranch?
A. Yes, of course.
Q. Did you see water balloon fights, for instance?
A. Yes. Several times.
Q. And during the time from -- well, let me withdraw that.
During the entire time that you were there -- let me withdraw that.
Did you ever see Mr. Jackson do anything inappropriate with any child?
MR. AUCHINCLOSS: Objection; leading.
THE COURT: Overruled.
THE WITNESS: Never. No, never.
MR. AUCHINCLOSS: Foundation.
Q. BY MR. SANGER: Did you see whether or not Mr. Jackson -- let me withdraw that.
During the time you were working in the kitchen in particular, as an assistant and then as a chef, did Mr. Jackson have high standards for the food that you prepared?
MR. AUCHINCLOSS: Objection; relevancy.
THE COURT: Sustained.
Q. BY MR. SANGER: Well, how did he want his guests to be treated, as far as you were concerned?
A. The best.
Q. Did Mr. Jackson himself complain about, for instance, food that he was served personally? 9631

MR. AUCHINCLOSS: Objection; relevancy.
THE COURT: Sustained.
Q. BY MR. SANGER: Did Mr. Jackson ever complain to you that the food that was being served to the children was not -- to the children or the adult guests was not adequate?
A. Yes, sometimes.
Q. Did you feel that he was complaining unreasonably?
MR. AUCHINCLOSS: Objection; relevance.
THE COURT: Overruled.
THE WITNESS: They were reasonable.
Q. BY MR. SANGER: Okay. And now if I may ask that other question. Did Mr. Jackson ever complain about the food that was served to himself?
MR. AUCHINCLOSS: Objection; relevance.
THE COURT: Overruled.
THE WITNESS: No, never.
Q. BY MR. SANGER: Now, yesterday at almost 8:00 at night, were you contacted by someone who indicated that they were a member of the sheriff's department?
A. Yes. There were two persons.
Q. Was this by telephone or in person?
A. By telephone.
Q. What were you doing when you were called?
A. I was working in my home.
Q. Where were you working in your home? 9632

MR. AUCHINCLOSS: Objection; relevancy.
THE COURT: Sustained.
MR. SANGER: Okay. All right. I have no questions.
THE COURT: We'll take our break.
MR. AUCHINCLOSS: Okay.
(Recess taken.)
THE COURT: Counsel?
MR. SANGER: I have no further questions.
THE COURT: All right.

CROSS-EXAMINATION
BY MR. AUCHINCLOSS:
Q. Good afternoon, Mr. Velasco.
A. Good afternoon.
Q. You mentioned that you saw nothing inappropriate between Mr. Jackson and young boys; is that correct?
A. Correct.
Q. Are you aware that he had unrelated young boys sleep with him alone in his room?
MR. SANGER: Objection. Beyond the scope; calls for speculation, without foundation.
THE COURT: Sustained.
Q. BY MR. AUCHINCLOSS: Do you think it is appropriate for young boys to sleep in a man's bed when they are unrelated to him and he is an adult?
MR. SANGER: Objection -- sorry. Objection. 9633

THE COURT: Sustained.
Q. BY MR. AUCHINCLOSS: Mr. Velasco, did you ever see -- well, let me back up. Were you permitted to go into Mr. Jackson's room when the door was closed?
A. I don't recall.
Q. Were you permitted to go into Mr. Jackson's room anytime you wished?
A. No.
Q. So can I safely say that you were not aware of what Mr. Jackson did in his room when the door was closed and he was in there with somebody?
A. Yes, of course.
MR. AUCHINCLOSS: All right. Thank you. No further questions.
MR. SANGER: No further questions.
THE COURT: All right. Thank you. You may step down.
Call your next witness.
MR. SANGER: Yes, sir. The defense will call Joe Marcus.
THE COURT: Please remain standing, face the clerk and raise your right hand.

JOSEPH MARCUS
Having been sworn, testified as follows:
//
THE WITNESS: I do. 9634

THE CLERK: Please be seated. State and spell your name for the record.
THE WITNESS: Joseph Marcus. J-o-s-e-p-h; M-a-r-c-u-s.
THE CLERK: Thank you.
MR. SANGER: Okay. Excuse me one second, Your Honor.

DIRECT EXAMINATION
BY MR. SANGER:
Q. Mr. Marcus, how are you?
A. Very well, thank you.
Q. All right. What is your current employment?
A. Currently employed at Neverland Valley Ranch as the property manager.
Q. And when you say "property manager," what are your duties?
A. My duties range from -- maintaining the property. There are multiple supervisors that I supervise on a daily basis, from the zoo, to the amusement park, to the maintenance of the property, to the irrigation, just the actual properties.
Q. All right. And when you say "property manager," are you sometimes referred to as the ranch manager?
A. Yes.
Q. So you are the -- at the top of the organizational chart as far as the ranch is 9635

concerned; is that correct?
A. Right under the top, yes.
Q. Right under. At the very top would be Mr.
Jackson, I take it?
A. That's correct.
Q. And you know Mr. Jackson?
A. I do.
Q. How long have you known Mr. Jackson?
A. About 18 years.
Q. Okay. Now, the ranch that's called
Neverland Ranch, was it always called Neverland
Ranch?
A. No. I believe it was called Sycamore Valley
Ranch before.
Q. And who owned the ranch before Mr. Jackson
did?
A. A gentleman by the name of Bone. William
Bone.
Q. Mr. Bone.
A. Yes.
Q. Did you work for Mr. Bone at Sycamore Valley
Ranch before Mr. Jackson owned the property?
A. Yes, I did.
Q. Did your father work for Sycamore Valley
Ranch before Mr. Jackson owned the property?
A. Yes.
Q. What was your father's job?
A. I believe he was the property manager at 9636

that time.
Q. So the bailiff is getting up to tell you --
A. Talk -- oh. I apologize.
Q. Don’t apologize. Every single witness has had that problem and the lawyers do from time to time. We have to get very close to the microphone to be heard.
Okay. So your father was the ranch manager at Sycamore Valley Ranch, is that correct, or for Mr. Bone?
A. Yes.
Q. And you worked at the ranch for a period of time yourself, Sycamore Valley Ranch, correct?
A. Very briefly, yes.
Q. What did you do while you were there?
A. I worked in maintenance department.
Q. All right. And after Mr. Jackson bought the ranch, did you continue on as an employee?
A. Yes.
Q. And what were your job assignments, or your job position when Mr. Jackson took over the ranch?
A. I actually transferred to security.
Q. Okay. Now, did Mr. Bone have a security department?
A. No.
Q. He was not a celebrity?
A. No.
Q. What did Mr. Bone do? 9637

A. I believe he was in land development.
Q. Okay. Real estate and --
A. Real estate, yes.
Q. -- that sort of thing?
All right. Now, did the main building --
the main buildings, which would be the residence
itself, the portion attached to it that now has the
garage and Mr. Jackson's office in it, the
guesthouse with the four guest units and the arcade
building, were those buildings all there when it was
Sycamore Valley Ranch?
A. Yes.
Q. The lake, was the lake there?
A. Yes.
Q. And there were irrigated pastures around the
main house?
A. There were.
Q. Since Mr. Jackson purchased the property,
have there been improvements to the property?
A. Yes.
Q. Can you tell us what improvements?
A. The number one main improvement would be the
trains. There are two trains. There's a steam
train as well as a 24-gauge train. There's also an
amusement park, a zoo, a theater, the train depot.
There's a teepee area that is also a water fort
area.
Q. All right. Was the theater in existence? 9638

A. No, Mr. Jackson built that.
Q. All right. So that was another addition?
A. Yes.
Q. And at the time that -- let me withdraw that. Let me ask you about the trains, because we've heard testimony about the trains.
You said there are two different trains.
Let's take the smaller one. Can you describe that train?
A. It's a small -- I believe it's on 24-gauge tracks. It's three cars that hold approximately 40 to 50 people, and that's really the description.
Q. All right. Have you ever been to the zoo in the City of Santa Barbara?
A. Yes.
Q. Have you seen the train there?
A. Yes.
Q. Is it similar to the one --
A. It is.
Q. All right. So adults can sit in it, but it's a fairly small train?
A. Exactly.
Q. And when the engineer sits behind the engine, the engineer is -- sits above the engine?
A. Exactly.
Q. All right. That train -- the tracks for that train go from where to where? Can you tell us?
A. From the golden gate -- 9639

MR. AUCHINCLOSS: I'm going to object.
Relevancy.
THE COURT: Overruled.
THE WITNESS: From the golden gate to the zoo area, throughout the property. It stops in front of the theater as well as the amusement park and travels all the way back to the zoo and back to the main house.
Q. BY MR. SANGER: So you can do a round trip from down near the main house and come back?
A. Exactly.
Q. By the way, when you mention the golden gates, let me just ask, is that the gate that's black with gold on top of it?
A. It is, the secondary gate.
Q. The big fancy Neverland gate, right?
A. Exactly.
Q. Is that gate locked?
A. I'm sorry?
Q. Is that gate locked?
A. No.
Q. If -- if you're driving in a vehicle, anywhere from a golf cart, to a car, to an SUV, to a truck, is there an automatic trip to open it?
A. There is.
Q. So it doesn't require anybody to give approval or manually do anything, correct?
A. The only thing that -- bicycles, it doesn't 9640

pick up bicycles or motorcycles.
Q. All right. As far as -- and then there is a manual way to open it --
A. There is.
Q. -- for a motorcycle.
And is there a way around the gate if you were on foot?
A. Yes.
Q. Or on a bicycle, for that matter?
A. Yes.
Q. So that gate does not effectively lock anybody in so they can't get out; is that right?
A. No.
Q. Now, the main gate is about how far from the golden gate?
A. It's probably a half -- a quarter to a half a mile.
Q. So you go down a road, and you end up down at Figueroa Mountain Road by the main gate, correct?
A. Yes.
Q. And that gate is operated by the guard, the security officer who's posted at the gate; is that correct?
A. That is correct.
Q. And that's both for coming in and going out, the guard will open the gates?
A. Yes.
Q. Adjacent to the gate is what kind of 9641

fencing?
A. It's a three-rail split, split three-rail fence.
Q. Split-rail, kind of rough wood fence?
A. Right.
Q. There's nothing to prevent somebody from going over it or going through the bars?
A. No.
Q. All right. You were talking about the trains. The other train on the property is what kind of train?
A. It's a refurbished steam train locomotive.
Q. Was it at one time a working train?
A. I believe it was.
Q. Okay. And so that's on bigger tracks?
A. Yes. 36-gauge.
Q. I'm sorry?
A. 36-gauge.
Q. All right. And those tracks go from where to where?
A. From just adjacent to the main house where the train depot is on the hill, to the -- to the zoo area also, and then there's a turn-around at both ends.
Q. All right. So instead of doing a loop or a round trip, that one you have to do a turn-around?
A. No, it's a loop at both ends.
Q. Oh, it is a loop? 9642

A. Yes.
Q. Okay. I'm sorry. So you could do a round trip by sitting on it and doing a loop back?
A. Yes.
Q. Okay. You mentioned the train depot being up on the hill, correct?
A. That's correct.
Q. If you are facing the house from the parking lot -- or I shouldn't say "parking lot," but from the parking area, the driveway right in front, and you're standing facing the front door, what direction are you facing? North, east, south or west, if you know, or some variation?
A. East.
Q. You're facing east?
A. From the door of the train depot?
Q. No, I'm sorry, the main house. If you're standing in front of the door --
A. Yes.
Q. -- you're about to knock on the door - okay? - what direction are you pointed?
A. North, or northwest is the train depot.
Q. Okay. You're facing the house, you're facing north?
A. North.
Q. Facing north. So the train depot --
A. Is west.
Q. -- is west. That's to your left, okay. 9643

So the train depot -- what's in the train depot?
A. There's artwork, pictures of trains. Small-scale trains. There's some Disney characters. Some of the old -- there's an old violin. There's also just a lot of different neat little artwork for people to look at.
Q. All right. I was going to say this is someplace where visitors are often taken or allowed to go --
A. Yes.
Q. -- to see things?
A. There's candy and there's video games, and it's a working train depot.
Q. All right. So it -- it looks almost like a museum inside, wouldn't you say?
A. Yes.
Q. You have been there at the ranch when large numbers of children, and adults for that matter, have been invited to come in groups; is that correct?
MR. AUCHINCLOSS: Objection; leading.
THE COURT: Overruled.
THE WITNESS: That is correct.
Q. BY MR. SANGER: And when that occurs, are the -- are the children, and the adults for that matter, permitted to go to the train station?
A. They are. 9644

Q. Is that an area that gets a lot of attention from the kids?
A. It does. It's -- yes.
Q. All right. And the kids usually are allowed to ride on the train as well; is that correct?
A. Yes.
Q. All right. You mentioned that Mr. Jackson also added the amusement park, correct?
A. Yes.
Q. And can you describe the amusement park?
A. It's -- it consists of about 16 rides, from small, young children rides all the way up to amusement-park-sized rides.
Q. All right. So it's the sort of amusement park you'd see -- it looks like a piece of perhaps Disneyland or something; is that correct?
A. That's correct.
Q. All right. So you have the smaller rides, you got the rides for the bigger kids and for adults and so on?
A. Yes.
Q. All right. And in addition to that, you said there's a theater. Where's the theater?
A. Just adjacent or west of the amusement park.
Q. And the amusement park and the theater are in what direction from the house?
A. North.
Q. So you go, from the house, north on a little 9645

road and it will take you up to the
theater/amusement park area; is that correct?
A. Exactly.
Q. Or you can take one of the other trains to
get there?
A. The trains, that's correct.
Q. About how far is it from the back of the
house to the main residence; in other words, to the
theater or the amusement park?
A. Probably a quarter -- quarter of a mile.
Q. All right. So did -- Mr. Jackson also added
a zoo. Can you describe the zoo?
A. It consists of -- do you want a rundown of
the animals or just --
Q. Sure. A general description of the facility
and the animals that are in it.
A. Yes. There's a tiger facility. Also an
elephant facility. A reptile department. A small
petting zoo for the children, different animals that
you can actually get up and be hands-on with. And
two orangutangs. Giraffes. And that's --
Q. Mr. Bone didn't have any of those there?
A. No. Just horses.
There's also horses.
Q. There are horses?
A. Correct.
Q. Are there people who are hired to be the
handlers or the trainers, caretakers of these 9646

various animals?
A. Yes.
Q. Are the animals -- in your experience, without going into a lot of detail unless we need to, are the animals well taken care of?
A. Yes.
Q. And do you have people, for instance, who are specifically there to take care of elephants and --
A. Exactly.
Q. And as far as horses, you've got people for the horses and so on?
A. That is correct.
Q. All right. You mentioned the teepee area and the water fort. What are those?
A. They're more of a fun area. The water fort is set up with water cannons and water balloon launchers. That's mainly for water fights. And just adjacent to that or north of that is -- there's three teepees with a nice big fire ring for maybe just hanging out at in the evening time.
Q. You said a fire ring. You're trailing off just a little bit. It's the end of the day, end of our day, anyway. You said a fire ring?
A. Fire ring. In between the three teepees.
Q. Talking about a place where you can have like a campfire? 9647

A. Exactly.
Q. All right. Are there any clocks at Neverland?
A. Yes.
Q. More than one or two?
A. Yes.
Q. About how many clocks do you think there are at Neverland?
A. Interior or exterior?
Q. Let's take exterior first.
A. Six. Five or six.
Q. Okay. Let's start with the clock that's on the hill just to the west of the guest units.
A. Yes.
Q. And we've had a picture of it here in court. It looks like it has flowers around it?
A. Yes.
Q. Do you have any idea how big that clock is? Anybody ever measure it?
A. I don't know that off the top of my head.
Q. In any event, can you see this clock in the front of the house?
A. Yes.
Q. Can you see it from where the guest units are?
A. Yes.
Q. Okay. And is that clock generally right?
A. Yes. 9648

Q. Okay. It's maintained by somebody in the clock department, I take it?
A. Yes.
Q. Or somebody in the maintenance department; is that right?
A. That is correct.
Q. Now, right up on top of the hill next to the big flower clock that you can see there is also a big clock on a stand, is there not?
A. Yes.
Q. And if you're in the area of the train station, can you see that clock?
A. You can.
Q. The -- down by the little train, that was the big train station. Going down to the little train station, which is just across the bridge from the main house, is there also a clock?
A. Yes.
Q. And can you describe that?
A. It's a two-face -- you can see it from the south as well as the north side. There's two faces on it. It's a hanging clock, about two feet in diameter.
Q. All right. So it's a big clock?
A. Yeah, two to three feet.
Q. Now, let's just take the year 2003, from February to March. Were both sides of that clock working? 9649

A. Yes.
Q. Subsequent to that time, did one side of that clock stop working?
A. It's a possibility. I don't recall.
Q. Are both sides working now?
A. I believe so.
Q. All right. There's also another clock directly behind the house; is that right?
A. Yes.
Q. It's on like a lamppost?
A. Right out the back door, yes.
Q. And is that a big clock?
A. It's fairly big.
Q. All right. When you say right outside the back door, can you explain where it is with relation to the back door of the residence where people might go in and out of the kitchen and eating areas?
A. If you were walking out the back door towards the arcade, you would pass it on your left, as well as if you were coming from the arcade going towards the guest units you would also pass it.
Q. Pretty much if you go out the back door and look over there, you can see it; is that correct?
A. Yes.
Q. Then -- did I cover six clocks? I'm not sure. Is there another clock I missed?
A. There's another clock on top of the train depot, on the roof. 9650

Q. Okay. Are there any clocks out at the amusement park?
A. There is, a four-face clock at the amusement park.
Q. Okay. Now, other than those outside clocks, are there also clocks inside the house?
A. Yes.
Q. Are there clocks inside the house in the areas where the ranch guests can see them?
A. Yes.
Q. Can you tell us, in the area -- the dining area where there's a bar, dining bar, and people can sit there right adjacent to the kitchen, are there any clocks that were visible from that vantage point?
A. I believe there's four that are visible from that -- from the bar area.
Q. Okay. Are there other clocks in the living room and other main parts of the house?
A. Yes.
Q. All right. Now, I took you back to -- back to before Mr. Jackson bought the property and just up to the point that you had gone to work there, or switched your employment to Mr. Jackson's company or his employment.
What jobs did you have over the years from the time that you started to now that you're ranch manager? 9651

A. I've worked in the maintenance department as well as security.
Q. So tell us about maintenance, to start with, briefly. Is that the first job you had was in maintenance?
A. Yes.
Q. What did you do?
A. Maintaining anything from electrical to plumbing, lighting, just the whole gauntlet of maintaining the property.
Q. All right. So as ranch manager now, you've got a pretty good idea of what it means if you tell somebody to go do something, right?
A. Yes.
Q. Probably done it yourself?
A. Most likely.
Q. All right. And how long did you do that before you went into security?
A. A couple of years.
Q. So that would have been about when to when?
A. '89 to '92 or so. '91 or '92, I believe.
Q. All right. And then you started in security, and what was your position?
A. Officer.
Q. And did you work shifts like everybody else?
A. Yes.
Q. All right. How long were you an officer in security? 9652

A. Five years.
Q. Okay. So somewhere in the mid ‘90s you ceased being an officer?
A. Yes.
Q. What did you do after that?
A. Went back to maintenance. I couldn’t stand the shifts.
Q. I couldn’t hear you.
A. I couldn’t stand the shifts.
Q. Okay. So maintenance was a little more regular?
A. Yes.
Q. All right. And how long were you in maintenance?
A. A couple more years.
Q. And then what did you do?
A. Then I’ve been in this position since then.
Q. So you became ranch manager. And when did you become ranch manager?
A. In 2002.
Q. All right. Now, based on your experience at the ranch, are you familiar with the operations of all the different departments?
A. Yes.
Q. Do the department heads for all the different departments report to you?
A. Yes.
Q. Who makes the daily decisions as to -- let 9653

1 me withdraw it and take out the word “daily.”
2 Who makes the decisions in general as to
3 what the policies will be in the various
4 departments?
5 A. Ultimately it would rest on my shoulders.
6 Q. All right. You go to Mr. Jackson and ask
7 him to approve the various policies and procedures
8 that you’re putting into place on the ranch?
9 A. Sometimes. It depends on what it is.
10 Q. If there’s something that particularly
11 impacts Mr. Jackson personally, you would do that?
12 A. Yes, definitely.
13 Q. Otherwise, you have the authority, as ranch
14 manager, to make sure that everybody does their job
15 and to -- your job is to run things; is that right?
16 A. That’s correct.
17 MR. AUCHINCLOSS: Objection; leading.
18 MR. SANGER: It was. I’ll withdraw it.
19 Q. With regard to each one of the departments,
20 what is your function as to the particular
21 departments?
22 A. Overseeing that the job is completed in a
23 timely fashion on a daily basis.
24 Q. Do you have meetings?
25 A. Yes.
26 Q. Do you have meetings with all the department
27 heads sometimes?
28 A. Yes. 9654

Q. And do you have meetings with individual department heads from time to time?
A. That's correct.
Q. Do you generally deal with the various employees at the lower levels of the hierarchy? Do you deal with them directly or do you tend to deal through their chain of command?
A. A little bit of both.
Q. All right. So you -- certainly you talk to people, employees?
A. Definitely.
Q. All right. Now, you were aware in 1993 that there had been a search of the ranch by the Los Angeles Police Department; is that correct?
A. Yes.
Q. And there was an investigation by the Los Angeles Police Department at that time; is that correct?
A. Yes.
Q. And at some point Mr. Sneddon's office and the sheriff's department got involved in an investigation in the '93 time period; is that right?
A. I don't recall, but I believe so.
Q. Okay. You had contact primarily with Los Angeles police officers at that time?
A. I don't recall.
Q. You were interviewed by police officers, either of Los Angeles or Santa Barbara; is that 9655

1 correct?
2 A. Yes.
3 Q. And did you cooperate with the officers at
4 that time?
5 A. Yes.
6 Q. And at the time, in 1993, that you were
7 interviewed by police officers you were still
8 working as a security officer at that time; is that
9 right?
10 A. Correct.
11 Q. So you had given us some approximate dates,
12 but does that -- that's within the time period that
13 you had been a police -- a security guard, correct?
14 A. Yes.
15 Q. And at the time you were contacted by law
16 enforcement, had you seen anything at the ranch that
17 was either inappropriate or illegal?
18 MR. AUCHINCLOSS: Objection; foundation.
19 THE COURT: Sustained.
20 Q. BY MR. SANGER: Okay. During the time that
21 you were a security guard, you had an opportunity to
22 observe activities at the ranch, correct?
23 A. Yes.
24 Q. And you had gate logs back then, right?
25 A. Yes.
26 Q. And you had interaction with other security
27 guards, correct?
28 A. Correct. 9656

Q. And you had interaction with your supervisors?
A. Yes.
Q. If you saw anything illegal, it was your job to report it to a supervisor; is that correct?
A. Correct.
MR. AUCHINCLOSS: Objection; leading.
THE COURT: Overruled.
MR. SANGER: The -- the answer was in, Your Honor?
THE COURT: Yes.
MR. SANGER: Okay. Thank you.
Q. Did you observe, during the time you were a security guard in the ‘90s, anything that caused you to report an illegal activity?
A. No.
Q. During the time in the ‘90s up until the time that you were interviewed in 1993 by whatever law enforcement agency it was, did you have occasion to see Mr. Jackson interact with his guests?
A. Yes.
Q. How often would you see that?
A. If he was home, probably daily.
Q. All right.
A. If he was out and about.
Q. Other times when Mr. Jackson would be on tour, and would not be there; is that correct?
A. Yes. 9657

Q. Or he might be staying someplace else for some other reason, correct?
A. That's true.
Q. During the, let's say, '92, '93 period, in that general area, how often was Mr. Jackson at the ranch; do you recall?
A. I don't recall. I believe he was on tour at that point, but I don't -- I'm not 100 percent.
Q. Did he come back to the ranch from time to time during the tour?
A. Yes.
Q. And so you had occasion to see him there between '92 and '93, correct?
A. I believe so.
Q. All right. And you saw him interact with guests; is that correct?
A. Yes.
Q. Did you ever see him do anything inappropriate with regard to any guests, adults or children?
A. No.
Q. If you had seen anything inappropriate, would you have reported it or taken it up with your supervisor?
A. Yes.
Q. Okay. Now, after the -- after that period of time, you understood there was an investigation, and after that period of time you continued to work 9658

at the ranch, correct?
A. Yes.
Q. And eventually when you became the ranch manager in 2002, it was part of your job to supervise the security and fire department, correct?
A. Correct.
Q. You were aware that you had a security officer by the name of Brian Barron; is that right?
A. That's correct.
Q. Were you aware that he was a sworn peace officer?
A. Yes.
Q. And Violet Silva was the chief of security at the time you became ranch manager; is that right?
A. Correct.
Q. Okay. And had you known Violet Silva the entire time that she had worked there?
A. Yes.
Q. Did you have a good working relationship with Violet Silva?
A. I believe so, yes.
Q. Okay. Did you feel that you had open communications both ways; that she could talk to you, you could talk to her about any concerns?
A. Yes.
Q. All right. Now, at some point, the Arvizo family came to stay at Neverland Ranch; is that correct? 9659

A. That's correct.
Q. And what do you recall about your first contact with the Arvizo family?
A. I believe they were -- my very first contact was when Gavin was ill with cancer.
Q. Okay. And who was there at the ranch with Gavin?
A. I believe his mother and his father and his two siblings.
Q. All right. Do you recall having any particular interaction with Janet Arvizo?
A. No.
Q. Do you recall having any particular interaction with any of the Arvizos --
A. On their first.
Q. -- on the first visit.
A. No. Just seeing them there. That was it.
Q. Were the -- did you see Mr. Jackson with the Arvizos?
A. If they were out and about. Possibly.
Q. All right. Now, after that first visit, did you have occasion to see any of the Arvizos again?
A. Yes.
Q. And what's your next recollection of the Arvizos?
A. My last recollection?
Q. Your next. In other words, when did you see them? You don't have to take them one by one. But 9660

did you see the Arvizos again?
A. Yes.
Q. And after the first visit, who came with the Arvizo children?
A. I believe it was just the mother. The mother and the children.
Q. Okay. The next time you recall seeing them, the mother was there?
A. They came with Chris Tucker once or twice.
Q. Were any parents with them when they came with Chris Tucker?
A. Not always.
Q. So you recall them being there with Chris Tucker, maybe parents. And then do you recall the mother being there again before or after the Chris Tucker visits?
A. Before and after.
Q. All right. Now, at some point -- well, let's put it this way. In February and March of 2003, do you recall the Arvizos being there?
A. Yes. Yes.
Q. Okay. And during that time period, do you recall who was with the Arvizo children for the most part?
A. Sometimes they were by themselves. Sometimes they were with their mother.
Q. The father wasn't around during this period of time? 9661

A. No.
Q. During that period of time, did you see anything that suggested that the -- any of the Arvizos were being held against their will?
MR. AUCHINCLOSS: I'll object. Foundation.
THE COURT: Sustained.
Q. BY MR. SANGER: Okay. During February and March of 2003, did you see the Arvizos there on the property?
A. Yes.
Q. Did you see the Arvizo kids out and about on the property?
A. Yes.
Q. What did you see Gavin and Star, the two boys, doing?
A. Do you mean besides just out having fun, just --
Q. Let's start with that. Were they out having fun?
A. They appeared to be having fun.
Q. Did you see them doing anything else besides out having fun?
A. They were a little destructive at times.
Q. All right. Did you see at any time during February and March 2003, anything that suggested that the Arvizo children wanted to leave and were not being allowed to leave?
A. No.

Q. Okay. They seemed to be happy to be there?
A. They did.
Q. You said they were a little destructive.
Can you give me an example of what you're talking
about?
A. Well, they just -- they didn't respect
property, if you will, from golf carts to -- I know
that they defaced a few areas on the property, wrote
some graffiti, if you will, and just not very
respectful.
Q. Did you see Janet Arvizo on the property in
February and March of 2003?
A. Yes.
Q. Did you see her outside of the buildings
from time to time?
A. Yes.
Q. And what did you see her doing?
A. She seemed to just be enjoying herself.
Q. Did you see her talking with other people?
A. Other people --
Q. Other -- talking with anybody, I suppose.
A. Yeah.
Q. Do you recall in particular any particular
individuals she was talking with?
A. With the housekeeping staff or with the
chefs, Dieter Weizner.
Q. When you saw her -- I'll come back to that
in one second. When you saw her talking with the 9663

chefs, did you see her inside the house?
A. Yes.
Q. Now, you were in and out of the house yourself; is that correct?
A. That's correct.
Q. And you had the combination to the doors in the house; is that right?
A. Correct.
Q. You had the combination to Mr. Jackson's private room?
A. Correct.
Q. If you were going to go into Mr. Jackson's private rooms, I should say plural, go into his suite, as we're calling it, would you knock first?
A. Yes.
Q. And how did you regard that part of the house?
A. How did I regard it? It was his space. His bedroom.
Q. All right. Were people allowed to just -- randomly allowed to go in and out of his space?
A. Yes.
Q. Okay. Now, was everybody that could get in the house, were they allowed to go into his space?
A. No, not unless they were invited, but --
Q. So if you had guests who were staying overnight at the ranch, would they be allowed to come into the house? 9664

A. Yes.
Q. And in what part of the house did they come into?
A. Mainly the house was open. It was downstairs. Other than his area.
Q. All right. So they'd be allowed to come in the kitchen area, the --
A. Living room.
Q. The family room?
A. The library.
Q. The dining area?
A. Uh-huh.
Q. Okay.
A. There's a crafts room upstairs.
Q. All right. And did people often come in and hang out in that family room/kitchen area?
A. Yes.
Q. Okay. Now, you said that you saw Janet talking with, I think you said the cooks; is that correct?
A. That's correct.
Q. Could you see her inside the house?
A. Yes.
Q. And where did you see her?
A. In the dining or kitchen area.
Q. Did you see her having meals or just sitting and talking, or what did you see?
A. Both. 9665

Q. All right. Did you see her sitting at the bar?
A. Yes.
Q. You mentioned that you saw her talking with Dieter Weizner?
A. Yes.
Q. Where were the two of them when they were talking to each other?
A. In the breezeway, in between the main house and the office or arcade area.
Q. Okay. Did you see her talking with Mr. Weizner in the kitchen or family room area at any time?
A. I don't recall.
Q. May have, but you don't recall?
A. No.
Q. All right. Did Janet Arvizo ever seem in any way to you, from what you saw, to want to leave the ranch and she was not allowed to do so?
A. No.
Q. Did she ever complain to you about anything?
A. Never.
Q. Now, is the -- let me withdraw that. Did you ever arrange for transportation for any of the Arvizos to and from any locations outside the ranch?
A. Yes.
Q. What arrangements did you make? 9666

A. If it was a phone call, to call for a car service, or I personally took them on more than one occasion off property.
Q. Where did you personally take them?
A. I -- actually, once, shopping in Solvang.
Q. Okay.
A. And --
Q. Now, when you went shopping in Solvang - let's take that, first of all - who went with you?
A. Janet Arvizo, and I believe it was just the two boys.
Q. Okay. And do you know where Davellin was?
A. I don't.
Q. Okay. So Janet Arvizo and the two boys went shopping in Solvang. You drove them; is that right?
A. Yes.
Q. And what vehicle did you drive, if you recall? Let's put it this way, was it a ranch vehicle?
A. Yes, it was one of the cars. I'm not sure exactly which one.
Q. Now, were you to guard them?
A. No.
Q. Did you restrain them in any way?
A. No.
Q. Did you prevent them from using the telephone?
A. No. 9667

Q. Did you prevent them from talking to anybody?
MR. AUCHINCLOSS: I'm going to object as to relevancy. It's irrelevant unless time is established.
MR. SANGER: I don't know about that. But it's a good point. I can establish the time.
Q. What time was this?
A. It was in the afternoon. Do you mean the date?
Q. Yeah. Was it in --
A. It was around that -- 2003, in February or March. I'm not exactly sure when.
Q. Somewhere in the February, March time period? Okay. And -- all right. So you took them into Solvang shopping. Did you stand there and watch over them while they were shopping?
A. No, it was mainly just transportation. I was actually at the car while they were out and about.
Q. So you drove them. You stayed at the car and they went shopping?
A. Yes.
Q. Did you in general -- if Janet wanted to go somewhere, Janet Arvizo, would she request someone to drive her?
MR. AUCHINCLOSS: Objection; hearsay.
THE COURT: Overruled. 9668

THE WITNESS: Yes. She didn't actually come with a vehicle, so --
Q. BY MR. SANGER: So you would then make arrangements for her transportation; is that correct?
A. That's correct.
Q. And on this particular occasion, you decided just to do it yourself?
A. Yeah, I believe so.
Q. All right. Now, during this shopping trip, about how long did it last; do you recall?
A. Less than an hour.
Q. Did you tell them, "You've got to go back to the ranch," or were they just through shopping?
A. No, they just came back to the car and were ready to go.
Q. All right. Do you recall what kind of stores they went to, or --
A. I was at the car.
Q. All right. And you drove them back to the ranch?
A. Yes.
Q. Now, was there ever a time when Janet Arvizo was followed by a positive PR film crew of Michael Jackson?
A. I don't know.
Q. On that occasion, nobody followed you to take photographs of Janet Arvizo shopping with her 9669

kids, as far as you know, right?
A. Not to my knowledge.
Q. Did you see anybody meeting any description like that?
A. No.
Q. Didn’t see any film cameras or crews or anything, correct?
A. No.
Q. Now, you said there was a shopping event. Was there another event where you either took them or went to pick them up or had something to do with their transportation?
A. Yes, I met them at a orthodontist, a local orthodontist in Solvang.
Q. All right. Excuse me just one second. Do you remember the name of the orthodontist?
A. Yes.
Q. And what was her name?
A. Jean Seamont.
MR. SANGER: Your Honor, may I put -- let me just make sure. This is in evidence. It’s 5020. And may I publish that?
MR. AUCHINCLOSS: May I take a look at that?
MR. SANGER: It’s this whole series here. You can take a look at them. There are some that weren’t received.
Q. That’s the sign in front of her office, 9670

right?
A. Yes.
Q. And where is her office located?
A. It's right off of 246 and First Street possibly.
MR. SANGER: Your Honor, I'd like to have marked for identification, it's been premarked as 5030, a map.
THE COURT: All right.
MR. SANGER: And I'd like to approach the witness, if I may.
THE COURT: All right.
MR. SANGER: May I just stand here and speak loud for a couple questions?
THE COURT: All right.
MR. SANGER: Thank you.
Q. As you look at that, does that appear to be a map of the Solvang area?
A. It does.
Q. Does that appear to have a star on it at or near where Dr. Seamont's office is located?
A. Yes.
Q. Okay. Does that accurately depict the area?
A. It does.
MR. SANGER: Your Honor, I'd move admittance of 5030.
MR. AUCHINCLOSS: No objection.
THE COURT: It's admitted. 9671

MR. SANGER: May I publish it?
THE COURT: Yes.
MR. SANGER: Thank you.
Q. This appears to be a commercially prepared map of some sort; is that right?
A. Yes.
Q. But where the little star -- okay, there's a star. It's a little more visible on the document than it is on the overhead here, but the little star that I'm circling, is that the approximate location of Dr. Seamont's office?
A. Yes.
Q. And I think everybody knows, but just in case, 246 goes right through the middle of Solvang; is that correct?
A. Yes.
Q. And Buellton's out thataway?
A. Yes.
Q. And Santa Ynez is out thataway. "Thataway" being to the right of the picture, the second "thataway," all right.
Now, is this doctor's office pretty much right on the corner -- not "right on the corner," but very close to the corner of Fifth Street and 246?
A. I believe there's one building in front of it, but, yes, it's very close to the corner.
Q. And I'd like to go through this series of 9672

pictures. There are some that were not admitted and I'm not going to refer to those. We'll start with 5020, which I just had up on the board.
All right. I'm going to put up 5021. Does that appear to be the front of Dr. Seamont's office?
A. Yes.
Q. And the -- 246, the main drag in Solvang, you said there's like a building in between the two. It would be over this way to the left; is that correct?
A. Yes.
Q. And I'm going to put up now 5022 and ask you, if you're standing in the front of Dr. Seamont's office, if that would be the -- what I was calling the main drag, 246, that goes through Solvang?
A. That's correct.
Q. That's the street where you go 25 miles an hour?
A. Yes.
Q. All right. Did you go inside Dr. Seamont's office?
A. Yes.
Q. I'm going to put up 5024, and ask you, does that appear to be the reception area?
A. Yes.
Q. And when you said -- I think you said you went to pick them up. So they were already there 9673

when you got there?
A. No, I actually met them there.
Q. You met them there?
A. Yes.
Q. Were they with anybody when you -- anybody from the ranch when you --
A. Yes.
Q. Who were they with?
A. Vinnie dropped them off.
Q. Okay. When you say “dropped them off,” what was -- what was the story?
A. He brought them to this location. And I met them there to transport them back to the property.
Q. Okay. Had they just arrived at the doctor’s office?
A. Yes.
Q. All right. Did you meet them out in front of the building or --
A. I did.
Q. Where did you meet them?
A. On the street.
Q. The street we just saw?
A. Exactly.
Q. So let’s go back to that really quickly. If I may, Your Honor, 5022. So right out there?
A. Right where that red car is.
Q. And did Vinnie have a car there? 9674

A. Yes.
Q. Were they in the car when you got there?
A. Actually, no. I was there first.
Q. Okay. So you were there waiting for them?
A. Yes.
Q. And when they showed up, what happened?
A. He left, and I escorted them into the place of business.
Q. Were you there to guard them?
A. No.
Q. Were you there to keep them from talking to anybody?
MR. AUCHINCLOSS: Objection; leading.
THE COURT: Sustained.
Q. BY MR. SANGER: Did you have any instructions from anybody to restrict their behavior in any way?
A. No.
Q. Did you -- were there telephones in the office?
A. Yes.
Q. Did you go -- what did you do after you -- you meet them on the street and then what happened? Just tell us what happened.
A. Walked in, introduced them to the doctor. And I waited in the waiting room. And Mrs. Arvizo and the two children were -- went into the -- not operating room, but the -- 9675

Q. It seems like an operating room, but --
A. Yes.
Q. If you don't like dental work.
So you never went back into the back?
A. No.
Q. Did you know Dr. Seamont before that?
A. No.
Q. Were you sitting in the front room to guard
the door so they couldn't leave?
MR. AUCHINCLOSS: Objection; leading.
THE COURT: Overruled.
THE WITNESS: No.
Q. BY MR. SANGER: Do you know if there was a
back way out of the office?
A. I'm sure there was. I didn't actually see
it.
Q. Did -- how long did the Arvizo family stay
at the dental office?
A. It was probably an hour to -- no more than
an hour and 20 minutes.
Q. What did you do during that hour, hour and
20 minutes?
A. Read magazines.
Q. Okay. When they were through at the office,
or they were through in the back doing whatever they
were doing, did you meet them in the reception room?
A. Yes.
Q. And where did you go from there? 9676

A. Drove them back to the property.
Q. Did they complain about getting in the car?
A. No. It was raining quite heavily, so they were running to get to the car.
Q. Okay. At any time while you were with them during that period of time, this dental visit, did any of them ever cry out for help?
A. No.
Q. Did you see anybody use the phone to call for help?
A. No.
Q. Did you hear anybody ask for help from anyone?
A. Not to my knowledge.
Q. Was there anything about their attitude or demeanor that made you think that any of the Arvizos were unwilling to be there or unwilling to go back to the ranch?
A. No, they were excited to be there.
MR. SANGER: Okay. This might be a good place to take a break, if it's all right, Your Honor.
THE COURT: We'll take our afternoon recess. See you in the morning. Remember it will be a half day tomorrow.
(The proceedings adjourned at 2:30 p.m.)
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REPORTER'S CERTIFICATE

THE PEOPLE OF THE STATE)
OF CALIFORNIA,)
Plaintiff,)
-vs-) No. 1133603
MICHAEL JOE JACKSON,)
Defendant.)

I, MICHELE MATTSON McNEIL, RPR, CRR, CSR #3304, Official Court Reporter, do hereby certify:

That the foregoing pages 9506 through 9677 contain a true and correct transcript of the proceedings had in the within and above-entitled matter as by me taken down in shorthand writing at said proceedings on May 9, 2005, and thereafter reduced to typewriting by computer-aided transcription under my direction.

DATED: Santa Maria, California, May 9, 2005.

MICHELE MATTSON McNEIL, RPR, CRR, CSR #3304